

Kami E. Quinn
Gilbert LLP
700 Pennsylvania Avenue, SE
Suite 400
Washington, DC 20003
Tele: 202.772.2200
Fax: 202.772.3333
Email: quinnk@gilbertlegal.com

*Co-Counsel to the Ad Hoc Committee of
Governmental and Other Contingent
Litigation Claimants*

**UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

<i>In re:</i>	:	
	:	
	:	Chapter 11
PURDUE PHARMA L.P., <i>et al.</i> ,	:	
	:	Case No. 19-23649 (RDD)
	:	
Debtors. ¹	:	(Jointly Administered)
	:	

**TWENTY-THIRD MONTHLY FEE STATEMENT OF GILBERT LLP,
FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND
REIMBURSEMENT OF EXPENSES INCURRED AS CO-COUNSEL TO THE AD HOC
COMMITTEE OF GOVERNMENTAL AND OTHER CONTINGENT LITIGATION
CLAIMANTS FOR THE PERIOD AUGUST 1, 2021 THROUGH AUGUST 31, 2021**

¹ The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

Name of Applicant:	Gilbert LLP
Authorized to provide professional services to:	Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants
Date of Order Approving Debtors' Payment of Fees and Expenses of Applicant:	December 2, 2019 (Docket #553)
Period for which compensation and reimbursement is sought:	August 1, 2021 through August 31, 2021
Amount of compensation sought as actual, reasonable, and necessary:	\$755,693.20 (80% of \$944,616.50)
Amount of expense reimbursement sought as actual, reasonable and necessary:	\$47,565.48 (100%)
This is a:	Monthly Fee Statement

Pursuant to 11 U.S.C. §§ 105(a), 363(b), and 365 of title 11 of the United States Code (the “**Bankruptcy Code**”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), the *Order Authorizing the Debtors to Assume the Reimbursement Agreement and Pay the Fees and Expenses of the Ad Hoc Committee’s Professionals* entered by this Court on December 2, 2019 [Docket #553] (the “**Reimbursement Order**”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket #529] (the “**Procedures Order**”), the law firm of Gilbert LLP (“**Gilbert LLP**”), Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants (the “**AHC**”), hereby submits this twenty-third monthly fee statement (the “**Monthly Fee Statement**”) for legal services rendered and reimbursement for expenses incurred for the period commencing August 1, 2021 through August 31, 2021 (the “**Application Period**”).

Itemization of Services Rendered and Expenses Incurred

1. Annexed hereto as **Exhibit A** is a chart of the aggregate number of hours expended and fees incurred by professionals and paraprofessionals during the Application Period by project category. As reflected on Exhibit A, Gilbert LLP incurred \$944,616.50 in fees during

the Application Period. Pursuant to this Monthly Fee Statement, Gilbert LLP seeks reimbursement of 80% of such fees, totaling \$755,693.20.

2. Annexed hereto as **Exhibit B** is a chart of Gilbert LLP's professionals and paraprofessionals, including title, hourly rate, number of hours billed, and total fees of each attorney and paraprofessional who rendered services to the AHC in connection with these chapter 11 proceedings during the Application Period. The blended hourly rate of the attorneys during the Application Period is \$910.40. The blended hourly rate of paraprofessionals during the Application Period is \$275.77.

3. Annexed hereto as **Exhibit C** is the summary of reasonable and necessary expenses incurred during the Application Period. As reflected on Exhibit C, Gilbert LLP incurred \$47,565.48 in expenses during the Application Period. Pursuant to this Monthly Fee Statement, Gilbert LLP seeks reimbursement of 100% of such expenses, totaling \$47,565.48.

4. Annexed hereto as **Exhibit D** are the time records of Gilbert LLP for the Application Period, organized by project category with a daily log detailing the time spent by each professional and an itemization of expenses.

FILING AND SERVICE

5. This Monthly Fee Statement will be filed and served in accordance with the directives in the Procedures Order.

6. Pursuant to the Procedures Order, any party objecting to the payment of interim compensation and reimbursement of expenses as requested shall, within 14 days of service of the Monthly Fee Statement, serve via email, to the Notice Parties (as defined in the Procedures Order), a written notice setting forth the precise nature of the objection and the amount at issue.

7. If an objection is timely served pursuant to the Procedures Order, the Debtors shall be authorized and directed to pay Gilbert LLP the amount equal to 80% of the fees and 100% of the expenses that are not subject to an objection. Any objection must set forth the precise nature of the objection and the amount at issue. It shall not be sufficient to simply object to all fees and expenses.

WHEREFORE, Gilbert LLP respectfully requests compensation in the amount of \$755,693.20 (80% of \$944,616.50) and reimbursement of reasonable and necessary expenses incurred in the amount of \$47,565.48 (100%), for a total amount of \$803,258.68, for the Application Period.

Dated: October 5, 2021
Washington, DC

Respectfully submitted,

GILBERT LLP

/s/ Kami E. Quinn

Kami E. Quinn
700 Pennsylvania Avenue, SE
Suite 400
Washington, DC 20003
Tele: 202.772.2200
Fax: 202.772.3333
Email: quinnk@gilbertlegal.com

*Counsel for the Ad Hoc Committee of
Governmental and Other Contingent
Litigation Claimants.*

Exhibit A

Summary of Services by Category

SUMMARY OF SERVICES BY PROJECT CATEGORY

Project Code	Project Category	Hours Billed in Period	Fees for Period
A001	Asset Analysis & Recovery	32.5	\$26,026.00
A004	Case Administration	14.4	\$3,093.50
A006	Employment / Fee Applications	7.3	\$3,241.50
A009	Meetings / Communications with AHC & Creditors	24.7	\$30,927.50
A019	Plan of Reorganization / Disclosure Statement	846.8	\$720,294.50
A020	Insurance Adversary Proceeding	186.4	\$161,033.50
		1,112.1	\$944,616.50

Exhibit B

Summary of Compensation by Professional

SUMMARY OF COMPENSATION BY PROFESSIONAL

Name of Professional	Position / Year Admitted Practice	Hourly Billing Rate	Hours Billed for Period	Total Fees for Period
Scott D. Gilbert	Partner / District of Columbia - 1979 U.S. Court of Appeals for the District of Columbia – 1980 U.S. Court of International Trade - 1984 U.S. Supreme Court - 1987 U.S. District Court for the District of Columbia – 2008 Cherokee Nation - 2017 U.S. Court of Federal Claims – 2019	\$1,700.00	119.9	\$203,830.00
Kami E. Quinn	Partner / Commonwealth of Virginia – 2000 District of Columbia – 2006 U.S. Court of Appeals for the Third Circuit – 2009	\$1,100.00	45.2	\$49,720.00
Richard Leveridge	Partner / District of Columbia – 1981 State of New York – 1997	\$1,400.00	58.9	\$82,460.00
Craig J. Litherland	Partner / State of Texas – 1983 Supreme Court of Texas – 1983 U.S. Court of Appeals Fifth Circuit – 1984 U.S. District Court for the Southern District of Texas – 1985 U.S. Federal Court for the Eastern District of Michigan – 1995 District of Columbia - 2001 U.S. District Court for the Western District of Texas – 2008 Cherokee Nation – 2017	\$1,400.00	13.7	\$19,180.00
Richard Shore	Partner / State of New York – 1988 District of Columbia – 1989 U.S. Court of Appeals for the Third Circuit – 2009 U.S. Court of Appeals for the Fourth Circuit – 2014 U.S. Court of Appeals for the Ninth Circuit – 2014 U.S. Court of Appeals for the Fifth Circuit – 2017 Cherokee Nation – 2017	\$1,350.00	57.8	\$78,030.00
Hunter Winstead	Partner / Commonwealth of Virginia – 2004 District of Columbia – 2006	\$950.00	6.8	\$6,460.00
Jason Rubinstein	Partner / State of Maryland – 2006 District of Columbia – 2007 U.S. District Court for the District of Maryland – 2007 U.S. District Court for the District of Columbia – 2011	\$800.00	101.2	\$80,960.00
Jenna Hudson	Partner / State of Maryland – 2010 State of Massachusetts – 2010 District of Columbia - 2011 U.S. District Court for the District of Maryland – 2011 U.S. Court of Appeals for the First Circuit – 2015 U.S. Supreme Court - 2016 Cherokee Nation – 2017 U.S. District Court for the District of Columbia – 2019	\$725.00	134.5	\$97,512.50

Name of Professional	Position / Year Admitted Practice	Hourly Billing Rate	Hours Billed for Period	Total Fees for Period
Emily Grim	Partner / Commonwealth of Pennsylvania – 2010 State of Illinois – 2010 District of Columbia – 2012 U.S. District Court for the District of Columbia - 2016 U.S. Court of Federal Claims – 2020	\$700.00	166.6	\$116,620.00
Dan Wolf	Partner / State of New York – 2011 District of Columbia – 2013 Southern District of New York – 2011 U.S. Court of Appeals for the Ninth Circuit – 2012	\$700.00	55.1	\$38,570.00
Mike Rush	Of Counsel / State of Delaware – 2007 District of Columbia - 2017	\$675.00	14.3	\$9,652.50
Heather Frazier	Associate / State of Florida – 2009 District of Columbia - 2017	\$675.00	88.1	\$59,467.50
Sarah Sraders	Associate / State of New York – 2016 District of Columbia – 2017	\$575.00	49.2	\$28,290.00
Alison Gaske	Associate / District of Columbia – 2016	\$575.00	14.0	\$8,050.00
Ethan Kaminsky	Associate / State of New York – 2018	\$500.00	58.2	\$29,100.00
Janet Sanchez	Associate / Commonwealth of Virginia – 2020	\$375.00	7.8	\$2,925.00
Rachael Lyle	Staff Attorney / State of Alabama – 2017 District of Columbia - 2018	\$310.00	13.9	\$4,309.00
Stephanie Colcock	Paralegal – Joined firm in 2020	\$330.00	16.8	\$5,544.00
Alyssa Bonesteel	eDiscovery Specialist – Joined firm in 2017	\$315.00	24.7	\$7,780.50
Sherley Martinez	Paralegal – Joined firm in 2017	\$315.00	13.6	\$4,284.00
Katherine Johnson	Paralegal – Joined firm in 2018	\$230.00	23.9	\$5,497.00
Sara Ogrey	Paralegal – Joined firm in 2019	\$230.00	14.2	\$3,266.00
Michael Lloyd	Project Assistant – Joined firm in 2021	\$195.00	9.1	\$1,774.50
Peggy Holland	Litigation Specialist – Joined firm in 2002	\$290.00	4.6	\$1,334.00
	Totals		1,112.1	\$944,616.50
	Attorney Blended Rate	\$910.40		
	Paraprofessional Blended Rate	\$275.77		

Exhibit C

Summary of Expenses Incurred

SUMMARY OF EXPENSES INCURRED

DESCRIPTION	Total Expenses for Period
Contract Professional Fees – Expert	\$45,031.25
Lexis	\$260.61
Pacer	\$204.30
Westlaw	\$2,069.32
Total	\$47,565.48

Exhibit D

Time and Expense Detail



700 Pennsylvania Avenue, SE
Suite 400
Washington, DC 20003
O 202.772.2200
F 202.772.3333
GilbertLegal.com

Ad Hoc Committee
c/o Marshall S. Huebner
Davis Polk & Wardwell LLP
450 Lexington Avenue
New York, NY 10017

October 4, 2021
Invoice Number: 11324269
Client Number: 1599
Tax ID: 52-2283869

FOR PROFESSIONAL SERVICES RENDERED through August 31, 2021

Re: Ad Hoc Committee (Purdue)

Matter Description	Fees	Costs	Total
Purdue Bankruptcy	944,616.50	47,565.48	992,181.98
Total	944,616.50	47,565.48	992,181.98

TOTAL FEES \$ 944,616.50

TOTAL EXPENSES \$ 47,565.48

TOTAL FEES AND EXPENSES \$ 992,181.98

FOR PROFESSIONAL SERVICES RENDERED through August 31, 2021

Purdue Bankruptcy

A001: Asset Analysis & Recovery

Name	Date	Services	Hours	Amount
Hudson, J.	8/01/21	Revise letter to Insurer #22.	.20	145.00
Hudson, J.	8/01/21	Revise demand letter to Insurers #18, #19, and #20.	.30	217.50
Hudson, J.	8/01/21	Revise potential discounting applicable to insurers in advance of settlement discussions.	1.50	1,087.50
Hudson, J.	8/01/21	Review draft settlement agreement provided by Insurer #12.	.10	72.50
Gilbert, S.	8/02/21	Confer with team re insurance strategy.	.20	340.00
Shore, R.	8/02/21	Analyze insurance settlement strategy.	1.00	1,350.00
Shore, R.	8/02/21	Confer with team re insurance recovery strategy.	.20	270.00
Hudson, J.	8/02/21	Confer with bankruptcy and insurance teams re insurance recovery strategy.	.20	145.00
Hudson, J.	8/02/21	Confer with counsel for Insurers #18, #19, and #20 re settlement demand.	.10	72.50
Hudson, J.	8/02/21	Analyze potential discounting applicable to insurers in advance of settlement discussions.	5.60	4,060.00
Hudson, J.	8/02/21	Analyze next steps for insurance recovery.	.50	362.50
Rubinstein, J.	8/02/21	Confer with team re insurance strategy.	.20	160.00
Wolf, D.	8/02/21	Confer with S. Gilbert, R. Shore, R. Leveridge, J. Rubinstein, J. Hudson, S. Sraders, A. Gaske, and E. Kaminsky re insurance recovery strategy.	.20	140.00
Gaske, A.	8/02/21	Confer with team re insurance strategy.	.20	115.00
Leveridge, R.	8/02/21	Confer with team re insurance strategy.	.20	280.00
Ogrey, S.	8/02/21	Revise master list of cases against Debtors.	.70	161.00
Sraders, S.	8/02/21	Confer with team re status of ongoing matters and next steps.	.20	115.00
Kaminsky, E.	8/02/21	Confer with team re insurance recovery strategy.	.20	100.00
Gilbert, S.	8/03/21	Confer with R. Shore and J. Hudson re settlement strategy.	.50	850.00
Shore, R.	8/03/21	Confer with S. Gilbert and J. Hudson re revised settlement analysis for insurance.	.50	675.00
Hudson, J.	8/03/21	Finalize confidentiality agreement with Insurers #18, #19, and #20.	.10	72.50

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Name	Date	Services	Hours	Amount
Hudson, J.	8/03/21	Analyze treatment of limits under certain insurers' policies for settlement discussions.	.30	217.50
Hudson, J.	8/03/21	Confer with Debtors (A. Kramer) and UCC (A. Preis) re demand to Insurers #18, #19, and #20.	.20	145.00
Hudson, J.	8/03/21	Draft summary of settlement analysis for AHC.	1.80	1,305.00
Hudson, J.	8/03/21	Confer with S. Gilbert and R. Shore re revised settlement analysis for insurance.	.50	362.50
Gaske, A.	8/03/21	Analyze treatment of limits under certain insurers' policies for settlement discussions.	.30	172.50
Shore, R.	8/04/21	Review note from J. Hudson re settlement authority for AHC.	.70	945.00
Hudson, J.	8/04/21	Revise demand letter to Insurers #18, #19, and #20.	.20	145.00
Hudson, J.	8/04/21	Revise summary of insurance settlement discounts for AHC.	.90	652.50
Hudson, J.	8/06/21	Confer with Debtors (A. Kramer, Reed Smith) re Kemper proof of claim follow-up.	.10	72.50
Hudson, J.	8/06/21	Confer with Debtors (A. Kramer, Reed Smith) re demand to Insurers #18, #19, and #20.	.10	72.50
Gaske, A.	8/06/21	Revise tracking spreadsheet re correspondence with Insurer #25.	.30	172.50
Hudson, J.	8/09/21	Analyze updated settlement discount analysis.	.10	72.50
Hudson, J.	8/09/21	Confer with counsel for Insurers #18, #19, and #20 re settlement meeting.	.10	72.50
Hudson, J.	8/09/21	Review comments from Debtors (A. Kramer, Reed Smith) re demand to Insurers #18, #19, and #20.	.10	72.50
Hudson, J.	8/10/21	Revise summary of insurance settlement approach for AHC working group.	1.10	797.50
Hudson, J.	8/10/21	Confer with counsel for Insurers #18, #19, and #20 re settlement meeting.	.20	145.00
Hudson, J.	8/11/21	Analyze next steps for insurance recovery.	.20	145.00
Wolf, D.	8/11/21	Revise PowerPoint re insurance coverage analysis.	.70	490.00
Hudson, J.	8/12/21	Review issues for insurance settlement presentation to AHC working group.	.30	217.50
Hudson, J.	8/13/21	Draft 1-page summary of settlement discounting for discussion with AHC.	1.20	870.00
Leveridge, R.	8/13/21	Review communications between Debtors' counsel re settlement release issues raised by Travelers/Gulf/St. Paul.	.40	560.00
Hudson, J.	8/15/21	Revise settlement analysis for insurance negotiations.	.80	580.00

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Name	Date	Services	Hours	Amount
Shore, R.	8/16/21	Confer with D. Wolf and J. Hudson re insurance coverage analysis.	1.10	1,485.00
Hudson, J.	8/16/21	Revise insurance settlement summary materials in advance of insurance settlement strategy meeting with AHC representatives (2.2); confer with R. Shore and D. Wolf re insurance coverage analysis (1.1).	3.30	2,392.50
Wolf, D.	8/16/21	Confer with R. Shore and J. Hudson re insurance coverage analysis.	1.10	770.00
Hudson, J.	8/23/21	Review claim update provided to Kemper.	.10	72.50
Hudson, J.	8/25/21	Confer with Insurers #5 and #36 re settlement-related confidentiality agreement.	.10	72.50
Hudson, J.	8/25/21	Confer with Insurers #18, #19, and #20 re settlement meeting.	.10	72.50
Martinez, S.	8/25/21	Review and organize May 14, 2021 settlement correspondence; update databases accordingly.	.70	220.50
Ogrey, S.	8/25/21	Review 8/23/2021 letter from Debtors to Lumbermens (Kemper) re response for additional information of Debtor's claim.	.40	92.00
Hudson, J.	8/26/21	Analyze next steps for insurance recovery.	.20	145.00
Hudson, J.	8/30/21	Confer with Insurers #18, #19, and #20 re settlement.	.10	72.50
Shore, R.	8/31/21	Review insurance settlement materials for meeting with J. Rice.	.40	540.00
Hudson, J.	8/31/21	Review materials for insurance settlement authority meeting with AHC representative (J. Rice).	.10	72.50
Hudson, J.	8/31/21	Update insurance settlement calculations.	1.30	942.50
Project Total:			32.50	\$ 26,026.00

A004: Case Administration

Name	Date	Services	Hours	Amount
Ogrey, S.	8/02/21	Update case calendar re proposed third amended order approving certain dates and protocols.	1.20	276.00
Johnson, K.	8/09/21	Draft pro hac vice applications for H. Frazier and S. Sradars.	1.80	414.00
Lloyd, M.	8/10/21	Review bankruptcy and adversary proceeding dockets for recent filings (0.9); draft summary of same (0.7).	1.60	312.00
Johnson, K.	8/11/21	Finalize pro hac vice application for H. Frazier.	1.00	230.00
Johnson, K.	8/11/21	File notice of appearance and pro hac vice application for S. Sradars.	.30	69.00

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Name	Date	Services	Hours	Amount
Colcock, S.	8/11/21	Review case updates.	1.00	330.00
Lloyd, M.	8/16/21	Review bankruptcy and adversary dockets for recent filings (1.5); draft summary of same (1.2).	2.70	526.50
Lloyd, M.	8/23/21	Review bankruptcy and adversary dockets for recent filings (2.2); draft summary of same (2.6).	4.80	936.00
Project Total:			14.40	\$ 3,093.50

A006: Employment / Fee Applications

Name	Date	Services	Hours	Amount
Holland, P.	8/03/21	Finalize June fee statement.	.60	174.00
Holland, P.	8/03/21	Analyze Fee Examiner's initial report and spreadsheet re 5th interim fee application.	1.40	406.00
Holland, P.	8/03/21	Draft response to Fee Examiner's initial report re 5th interim fee app.	1.10	319.00
Holland, P.	8/04/21	Communicate with Fee Examiner and US Trustee re June fee statement.	.10	29.00
Hudson, J.	8/06/21	Revise supplemental order approving retention of Gnarus in connection with confirmation.	.50	362.50
Grim, E.	8/06/21	Revise reimbursement motion for Gnarus.	.40	280.00
Hudson, J.	8/09/21	Confer with Debtors (Davis Polk) re supplemental order approving retention of Gnarus in connection with confirmation.	.20	145.00
Grim, E.	8/09/21	Revise response to Fee Examiner letter.	1.10	770.00
Grim, E.	8/10/21	Finalize response to fee examiner report.	.50	350.00
Holland, P.	8/11/21	Communicate with D. Klauder re response to initial report related to fifth interim fee app.	.20	58.00
Holland, P.	8/25/21	Draft July fee statement.	1.20	348.00
Project Total:			7.30	\$ 3,241.50

A009: Meetings / Communications with AHC & Creditors

Name	Date	Services	Hours	Amount
Gilbert, S.	8/03/21	Confer with AHC working group re plan.	.80	1,360.00
Gilbert, S.	8/04/21	Confer with AHC representatives re plan issues.	1.00	1,700.00
Gilbert, S.	8/05/21	Confer with AHC re plan issues.	1.00	1,700.00
Gilbert, S.	8/09/21	Confer with AHC working group members re issues in plan.	1.00	1,700.00
Gilbert, S.	8/09/21	Confer with AHC working group re plan issues.	1.00	1,700.00

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Name	Date	Services	Hours	Amount
Gilbert, S.	8/10/21	Confer with AHC working group re open plan issues.	1.50	2,550.00
Hudson, J.	8/10/21	Confer with AHC working group re insurance settlement approach.	.10	72.50
Gilbert, S.	8/11/21	Confer with AHC re confirmation strategy.	.90	1,530.00
Hudson, J.	8/11/21	Attend portion of Ad Hoc Committee meeting re status and strategy.	.50	362.50
Grim, E.	8/11/21	Confer with AHC re confirmation hearing and DMP negotiations.	.90	630.00
Wolf, D.	8/11/21	Confer with clients and co-counsel re confirmation hearing.	.90	630.00
Sraders, S.	8/11/21	Confer with Ad Hoc Committee re next steps in bankruptcy, including upcoming confirmation hearing.	.90	517.50
Gilbert, S.	8/16/21	Confer with AHC working group re insurance strategy.	1.00	1,700.00
Shore, R.	8/16/21	Confer with client re settlements.	1.00	1,350.00
Hudson, J.	8/16/21	Confer with AHC working group re settlement strategy.	1.00	725.00
Wolf, D.	8/16/21	Confer with clients and co-counsel re insurance recovery strategy.	1.00	700.00
Hudson, J.	8/17/21	Confer with AHC working group re insurance settlement strategy.	.10	72.50
Hudson, J.	8/18/21	Confer with AHC re plan negotiations and confirmation hearing.	1.20	870.00
Grim, E.	8/18/21	Confer with AHC re negotiations with DMPs and confirmation hearing update.	1.20	840.00
Frazier, H.	8/18/21	Confer with AHC re report on status of DMP settlement.	1.20	810.00
Sraders, S.	8/18/21	Confer with AHC re current status of proceedings and strategy for next steps.	1.20	690.00
Gilbert, S.	8/19/21	Confer with AHC re plan issues.	.50	850.00
Gilbert, S.	8/20/21	Confer with AHC working group members re trust issues.	1.00	1,700.00
Hudson, J.	8/23/21	Communicate with AHC re authority for insurance settlement demands.	.10	72.50
Gilbert, S.	8/24/21	Confer with AHC working group re plan issues.	1.50	2,550.00
Gilbert, S.	8/25/21	Confer with AHC re plan.	1.00	1,700.00
Hudson, J.	8/30/21	Communicate with client re approval for insurance settlement negotiations.	.20	145.00
Gilbert, S.	8/31/21	Confer with AHC re plan issues.	1.00	1,700.00
		Project Total:	24.70	\$ 30,927.50

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A019: Plan of Reorganization / Disclosure Statement

Name	Date	Services	Hours	Amount
Hudson, J.	8/01/21	Analyze Debtors' proposed approach to MDT insurance collateral.	.30	217.50
Hudson, J.	8/01/21	Draft outline re plan confirmation.	.10	72.50
Grim, E.	8/01/21	Continue to draft reply to insurer and co-defendant objections.	6.60	4,620.00
Gilbert, S.	8/02/21	Correspond with AHC working group re plan issues.	.50	850.00
Gilbert, S.	8/02/21	Confer with J. Hudson re MDT insurance strategy.	.20	340.00
Gilbert, S.	8/02/21	Confer with K. Eckstein re plan issues.	.50	850.00
Gilbert, S.	8/02/21	Correspond with Debtors (S. Birnbaum, others) re plan issues.	.50	850.00
Quinn, K.	8/02/21	Confer with E. Grim and H. Frazier re "neutrality" arguments.	.30	330.00
Quinn, K.	8/02/21	Revise co-defendant insert for confirmation brief.	1.20	1,320.00
Shore, R.	8/02/21	Confer with Debtors' counsel (M. Tobak) re insurance/plan issues.	.50	675.00
Hudson, J.	8/02/21	Confer with Debtors (Davis Polk) re revising confirmation order and other materials for confirmation hearing.	.50	362.50
Hudson, J.	8/02/21	Confer with Debtors (Davis Polk) re finalizing confirmation order.	.10	72.50
Hudson, J.	8/02/21	Confer with Debtors (Davis Polk) re treatment of certain MDT insurance collateral.	.30	217.50
Hudson, J.	8/02/21	Confer with S. Gilbert re Debtors' proposed treatment of certain MDT insurance collateral.	.20	145.00
Hudson, J.	8/02/21	Analyze responses to insurers' due diligence argument on "neutrality" provision.	.20	145.00
Hudson, J.	8/02/21	Analyze insurance proposal from IACs.	.10	72.50
Hudson, J.	8/02/21	Revise confirmation brief sections on insurance.	.40	290.00
Grim, E.	8/02/21	Confer with K. Quinn and H. Frazier re "neutrality" issues.	.30	210.00
Grim, E.	8/02/21	Continue to draft reply to insurer and co-defendant objections.	6.80	4,760.00
Grim, E.	8/02/21	Research issues relevant to reply to insurer and co-defendant objections.	1.10	770.00
Grim, E.	8/02/21	Confer with Debtors' counsel (M. Tobak) re confirmation order findings.	.50	350.00

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Rubinstein, J.	8/02/21	Revise insurance objection response and brief in support of confirmation (1.3); communications with AHC co-counsel re same (0.3); analysis re J. Horewitz declaration (0.8); analysis re proposed order re plan (1.1).	3.50	2,800.00
Frazier, H.	8/02/21	Revise co-defendant objection insurance section to reflect various comments and revisions.	1.60	1,080.00
Frazier, H.	8/02/21	Confer with Debtors' counsel re confirmation order issues related to insurance.	.50	337.50
Frazier, H.	8/02/21	Communicate with E. Grim, J. Hudson and J. Rubinstein re various confirmation related pleadings and issues.	.40	270.00
Frazier, H.	8/02/21	Confer with K. Quinn and E. Grim re insurance "neutrality" issues.	.30	202.50
Frazier, H.	8/02/21	Review draft reply brief re insurance issues.	.30	202.50
Johnson, K.	8/02/21	Review and organize plan documents.	1.00	230.00
Sraders, S.	8/02/21	Analyze issues relating to co-defendant negotiations.	.70	402.50
Gilbert, S.	8/03/21	Confer with Debtors (M. Kesselman and S. Birnbaum) re plan issues.	.50	850.00
Gilbert, S.	8/03/21	Confer with co-counsel re confirmation hearing.	1.00	1,700.00
Gilbert, S.	8/03/21	Correspond with AHC working group re plan issues.	.50	850.00
Gilbert, S.	8/03/21	Confer with co-counsel re confirmation issues and briefs.	1.00	1,700.00
Winstead, H.	8/03/21	Review updated draft affidavits and briefs re section 5.8 of plan and related US Trustee objection.	2.20	2,090.00
Hudson, J.	8/03/21	Review insurers' proposal re reopening discovery to attempt to resolve confirmation objection.	.10	72.50
Hudson, J.	8/03/21	Revise plan with respect to settling insurer injunction	.10	72.50
Hudson, J.	8/03/21	Revise confirmation brief sections re insurance.	3.10	2,247.50
Hudson, J.	8/03/21	Revise plan with respect to insurance.	.40	290.00
Grim, E.	8/03/21	Continue to draft reply to Gulf objection re contribution claims.	3.30	2,310.00
Grim, E.	8/03/21	Research issues relevant to reply to insurer objections.	.80	560.00
Grim, E.	8/03/21	Continue to draft reply to insurer and co-defendant objections.	6.90	4,830.00
Rubinstein, J.	8/03/21	Revise brief in support of confirmation (4.5); analysis re proposed order (0.5).	5.00	4,000.00
Frazier, H.	8/03/21	Analyze issues re settling insurer injunction.	.40	270.00

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Name	Date	Services	Hours	Amount
Frazier, H.	8/03/21	Analyze various issues related to confirmation briefs and related documents.	.40	270.00
Frazier, H.	8/03/21	Research re precedent for insurer injunctions.	.70	472.50
Frazier, H.	8/03/21	Review draft re insurer objections.	.80	540.00
Johnson, K.	8/03/21	Review and provide citation for reply (0.1); review past bankruptcy confirmation orders (0.1); review docket for relevant pleadings (0.2).	.40	92.00
Johnson, K.	8/03/21	Research bankruptcy plans re insurer language.	2.00	460.00
Ogrey, S.	8/03/21	Review plan language re insurer injunctions.	.90	207.00
Sraders, S.	8/03/21	Research re response to insurer objections re insurance "neutrality".	1.60	920.00
Kaminsky, E.	8/03/21	Draft response to insurer objection.	2.20	1,100.00
Kaminsky, E.	8/03/21	Research reply to insurer objections	.50	250.00
Gilbert, S.	8/04/21	Confer with co-counsel re objections to plan.	1.50	2,550.00
Gilbert, S.	8/04/21	Confer with K. Maclay re plan issues.	.50	850.00
Gilbert, S.	8/04/21	Confer with co-counsel re confirmation hearing briefing.	1.50	2,550.00
Quinn, K.	8/04/21	Revise draft brief re insurance "neutrality" and findings.	1.20	1,320.00
Quinn, K.	8/04/21	Review revised draft "neutrality" language.	.20	220.00
Shore, R.	8/04/21	Review note to Court from Davis Polk re determination of merits of opioid claims in light of necessary findings (0.8); communications with team re same (0.4); review proposal from Chubb re "neutrality" (1.0).	2.20	2,970.00
Shore, R.	8/04/21	Review and provide comments re insurance section of confirmation brief.	3.00	4,050.00
Litherland, C.	8/04/21	Revise brief re insurance "neutrality" objections.	.90	1,260.00
Litherland, C.	8/04/21	Communications with J. Hudson, R. Shore and others re "neutrality" drafts.	.60	840.00
Winstead, H.	8/04/21	Confer with Kramer Levin team re argument points on fee issues.	1.10	1,045.00
Winstead, H.	8/04/21	Additional review of draft briefs and affidavits and evaluation of further revisions thereto.	2.10	1,995.00
Hudson, J.	8/04/21	Revise confirmation brief sections on insurance.	2.40	1,740.00
Hudson, J.	8/04/21	Review confirmation exhibit list for affirmative presentation on insurance issues.	.10	72.50
Hudson, J.	8/04/21	Review latest round of plan-related comments received by Chubb.	1.70	1,232.50
Hudson, J.	8/04/21	Review insurance-related provisions of draft seventh amended plan.	.40	290.00

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Hudson, J.	8/04/21	Confer with Debtors (Reed Smith) re insurers' "neutrality" arguments.	.60	435.00
Hudson, J.	8/04/21	Revise insurers' proposed revision to settling insurer injunction provisions of plan.	.50	362.50
Hudson, J.	8/04/21	Draft summary of insurance-related findings for discussion at August 4 hearing with Judge Drain.	1.20	870.00
Hudson, J.	8/04/21	Attend scheduling conference re scope of confirmation hearing.	1.00	725.00
Grim, E.	8/04/21	Revise reply to insurer objections based on feedback from co-counsel and team.	6.70	4,690.00
Grim, E.	8/04/21	Revise reply to co-defendant objections based on feedback from co-counsel and team.	1.10	770.00
Grim, E.	8/04/21	Review draft Debtors' reply to insurer objections.	.60	420.00
Grim, E.	8/04/21	Revise plan in response to insurer objections.	1.30	910.00
Grim, E.	8/04/21	Attend scheduling conference re confirmation proceedings.	.90	630.00
Grim, E.	8/04/21	Review attorneys' fee briefing and declarations.	.50	350.00
Rubinstein, J.	8/04/21	Analysis re exhibit list (0.4); analysis re confirmation related issues (1.0); revise analysis re confirmation brief (2.5); review draft declarations (1.5).	5.40	4,320.00
Wolf, D.	8/04/21	Review recent plan revisions re insurance coverage matters.	.30	210.00
Frazier, H.	8/04/21	Review revisions and comments to draft response to co-defendant objections re insurance issues.	.50	337.50
Frazier, H.	8/04/21	Analyze potential revisions to plan language re settled insurers.	.60	405.00
Frazier, H.	8/04/21	Analyze issues re language for inclusion in various confirmation briefs and draft order.	.90	607.50
Frazier, H.	8/04/21	Revise language re insurer injunction and settling insurers.	.20	135.00
Martinez, S.	8/04/21	Review and revise citations in reply to plan objections.	.90	283.50
Johnson, K.	8/04/21	Cite check reply to insurer "neutrality" objections.	1.00	230.00
Leveridge, R.	8/04/21	Review material to be submitted in support of plan re impact on insurance issues.	1.20	1,680.00
Ogrey, S.	8/04/21	Review and revise citations in reply to insurer "neutrality" objections brief.	1.00	230.00
Sraders, S.	8/04/21	Research in support of response to insurer objections to confirmation plan.	.60	345.00
Colcock, S.	8/04/21	Begin cite-checking certain sections of reply to insurer "neutrality" objections.	1.90	627.00

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Name	Date	Services	Hours	Amount
Quinn, K.	8/05/21	Confer with R. Shore and E. Grim re revised confirmation brief.	.80	880.00
Quinn, K.	8/05/21	Review briefing in preparation for call with client.	.50	550.00
Shore, R.	8/05/21	Confer with K. Quinn and E. Grim re revisions to insurer and co-defendant objections.	.80	1,080.00
Shore, R.	8/05/21	Review and provide comments to findings sections of confirmation brief.	1.30	1,755.00
Winstead, H.	8/05/21	Review additional revisions to plan confirmation brief on fees section.	.90	855.00
Hudson, J.	8/05/21	Revise confirmation brief sections on insurance.	7.20	5,220.00
Hudson, J.	8/05/21	Analyze approach to Purdue Canada's coverage request.	.20	145.00
Grim, E.	8/05/21	Continue to revise reply to insurer and co-defendant objections based on feedback from co-counsel and team.	7.10	4,970.00
Grim, E.	8/05/21	Confer with K. Quinn and R. Shore re revisions to insurer and co-defendant objections.	.80	560.00
Grim, E.	8/05/21	Communicate with co-counsel re revisions to insurer and co-defendant objections.	.70	490.00
Grim, E.	8/05/21	Review revisions to reply to US Trustee brief.	.30	210.00
Grim, E.	8/05/21	Revise proposed confirmation order.	.50	350.00
Rubinstein, J.	8/05/21	Revise and finalize confirmation brief and declaration in support.	8.00	6,400.00
Wolf, D.	8/05/21	Review Sackler settlement agreement.	.20	140.00
Frazier, H.	8/05/21	Analyze response to issues in Gulf brief re third party releases.	.20	135.00
Martinez, S.	8/05/21	Finalize cite checking and revisions to reply to plan objections.	4.50	1,417.50
Johnson, K.	8/05/21	Continue cite checking reply to insurer "neutrality" objections.	5.80	1,334.00
Ogrey, S.	8/05/21	Continue to review and revise citations in the reply to the insurer "neutrality" objections brief.	5.20	1,196.00
Sraders, S.	8/05/21	Review response to insurer objection to plan confirmation.	.20	115.00
Colcock, S.	8/05/21	Finish cite-checking certain sections of reply to insurer "neutrality" objections.	6.00	1,980.00
Gilbert, S.	8/06/21	Correspond with Debtors (S. Birnbaum) re plan issues.	.50	850.00
Quinn, K.	8/06/21	Analyze additional points re oral argument on insurance issues.	.40	440.00
Shore, R.	8/06/21	Analyze "neutrality" issues.	.50	675.00

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Name	Date	Services	Hours	Amount
Hudson, J.	8/06/21	Confer with insurers re further discussions to potentially resolve "neutrality" issue.	.40	290.00
Hudson, J.	8/06/21	Confer with Debtors (Reed Smith) re confirming for Navigators details of prior notice.	.10	72.50
Grim, E.	8/06/21	Review insurer evidentiary objections and Debtors' confirmation brief.	.40	280.00
Ogrey, S.	8/06/21	Review correspondence from Debtors to Evanston re plea agreement and civil settlement agreement.	.10	23.00
Hudson, J.	8/07/21	Confer with Debtors (Reed Smith) re "neutrality" related negotiations with insurers.	.10	72.50
Hudson, J.	8/07/21	Confer with AHC co-counsel (Kramer Levin) re proposed confirmation schedule.	.40	290.00
Gilbert, S.	8/08/21	Correspond with AHC, Debtors' counsel (S. Birnbaum) and DMP counsel re resolution of plan objections.	1.00	1,700.00
Quinn, K.	8/08/21	Review confirmation hearing schedule.	.30	330.00
Hudson, J.	8/08/21	Confer with expert (J. Horewitz) re potential cross-examination at confirmation.	.10	72.50
Hudson, J.	8/08/21	Outline insurance-related items to be addressed at confirmation hearing (0.6); confer with team re same (0.6).	1.20	870.00
Hudson, J.	8/08/21	Analyze potential bases of cross-examination of J. Horewitz.	.20	145.00
Hudson, J.	8/08/21	Confer with National Union re scope of findings being sought at confirmation.	.10	72.50
Grim, E.	8/08/21	Review proposed cross-examinations.	.40	280.00
Grim, E.	8/08/21	Confer with J. Hudson, J. Rubinstein, and H. Frazier re outlines and preparation for confirmation hearing.	.60	420.00
Rubinstein, J.	8/08/21	Review filings in advance of confirmation (1.0); confer with J. Hudson, E. Grim, and H. Frazier re strategy (0.6); analysis re J. Horewitz declaration (0.2).	1.80	1,440.00
Frazier, H.	8/08/21	Confer with J. Hudson, E. Grim and J. Rubinstein re confirmation issues.	.60	405.00
Frazier, H.	8/08/21	Review Debtors' draft re co-defendant objections.	.20	135.00
Gilbert, S.	8/09/21	Attend pre-trial conference.	2.60	4,420.00
Gilbert, S.	8/09/21	Confer with co-counsel re Topco and NewCo issues, including tax issues.	2.00	3,400.00
Gilbert, S.	8/09/21	Confer with M. Huebner re plan objections.	.50	850.00
Quinn, K.	8/09/21	Participate in pre-trial hearing (partial).	1.40	1,540.00

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Name	Date	Services	Hours	Amount
Quinn, K.	8/09/21	Correspond with team re "snapback reservation" issue.	.60	660.00
Quinn, K.	8/09/21	Confer with C. Litherland, J. Hudson and E. Grim re insurer "neutrality" issues.	.80	880.00
Shore, R.	8/09/21	Analyze stipulation re confirmation evidence.	1.30	1,755.00
Litherland, C.	8/09/21	Analyze stipulation re snapback litigation and other proceedings evidence limitations.	1.40	1,960.00
Litherland, C.	8/09/21	Confer with J. Hudson, K. Quinn, and E. Grim re plan "neutrality" provisions.	.80	1,120.00
Hudson, J.	8/09/21	Review agenda for pretrial conference.	.10	72.50
Hudson, J.	8/09/21	Attend pretrial conference.	2.60	1,885.00
Hudson, J.	8/09/21	Confer with team re insurance "neutrality" issues.	.80	580.00
Hudson, J.	8/09/21	Confer with co-counsel (Kramer Levin) re strategy for cross-examination of J. Horewitz.	.10	72.50
Hudson, J.	8/09/21	Review discussions between Debtors and objectors re confirmation schedule.	.10	72.50
Hudson, J.	8/09/21	Review Debtors' response to insurers' objection to plan.	.10	72.50
Hudson, J.	8/09/21	Analyze insurance proposal from IACs Purdue Canada.	.80	580.00
Hudson, J.	8/09/21	Revise snapback stipulation to address insurance issues.	1.20	870.00
Hudson, J.	8/09/21	Outline issues for discussion in "neutrality" related negotiations with insurers.	.40	290.00
Hudson, J.	8/09/21	Confer with Debtors (Reed Smith) re "neutrality" related negotiations with insurers.	.10	72.50
Hudson, J.	8/09/21	Confer with insurers re "neutrality" related negotiations.	.10	72.50
Hudson, J.	8/09/21	Communicate with expert (J. Horewitz) re confirmation hearing schedule based on pretrial conference.	.10	72.50
Grim, E.	8/09/21	Review confirmation protocols and objections in preparation for pre-trial conference.	.70	490.00
Grim, E.	8/09/21	Revise evidentiary stipulation.	.20	140.00
Grim, E.	8/09/21	Revise plan to address Canadian claims.	.20	140.00
Grim, E.	8/09/21	Confer with J. Hudson, K. Quinn, and C. Litherland re strategy for call with insurers.	.80	560.00
Grim, E.	8/09/21	Draft strategy outline re outstanding insurance issues for confirmation.	.90	630.00
Rubinstein, J.	8/09/21	Review Debtors' brief in support of confirmation as relates to proposed order (3.5); correspond with AHC co-counsel re procedural issues (0.2).	3.70	2,960.00

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Name	Date	Services	Hours	Amount
Wolf, D.	8/09/21	Revise plan documents re insurance coverage matters.	1.30	910.00
Frazier, H.	8/09/21	Review Debtors' response to insurer objections.	.60	405.00
Gilbert, S.	8/10/21	Confer with insurance team re strategy.	.50	850.00
Quinn, K.	8/10/21	Review revision to snapback reservation.	.10	110.00
Quinn, K.	8/10/21	Confer with team re status and strategy re upcoming confirmation hearing.	.50	550.00
Quinn, K.	8/10/21	Confer with Debtors' counsel re "neutrality" argument.	1.20	1,320.00
Quinn, K.	8/10/21	Confer with C. Litherland, R. Shore, and E. Grim re findings.	.70	770.00
Quinn, K.	8/10/21	Review and revise proposed findings list.	.30	330.00
Quinn, K.	8/10/21	Correspond re revised snapback legislation savings clause.	.20	220.00
Shore, R.	8/10/21	Confer with C. Litherland, K. Quinn, and E. Grim re findings.	.70	945.00
Shore, R.	8/10/21	Confer with Debtors' counsel re findings and "neutrality" (1.7); analyze same (0.8).	2.50	3,375.00
Shore, R.	8/10/21	Confer with K. Eckstein re potential NewCo board candidates.	.30	405.00
Litherland, C.	8/10/21	Confer with R. Shore, K. Quinn, and E. Grim re non-prejudice stipulation.	.70	980.00
Hudson, J.	8/10/21	Revise snapback stipulation to account for insurance issues.	.40	290.00
Hudson, J.	8/10/21	Confer with bankruptcy and litigation teams re insurance recovery status and strategy.	.50	362.50
Hudson, J.	8/10/21	Confer with Debtors (Davis Polk) and UCC (Akin Gump) re supplementing fee order to cover Gnarus retention.	.30	217.50
Hudson, J.	8/10/21	Analyze insurers' proposed revision to "neutrality" provision.	1.00	725.00
Hudson, J.	8/10/21	Review proposed schedule for presentation of confirmation evidence to prepare for J. Horewitz cross.	.10	72.50
Hudson, J.	8/10/21	Outline process for preparing J. Horewitz for cross-examination.	.10	72.50
Hudson, J.	8/10/21	Confer with Debtors (Reed Smith, Davis Polk, Dechert) re attempting to resolve disputes on "neutrality" issues and motion in limine.	1.70	1,232.50
Hudson, J.	8/10/21	Analyze insurance proposal from IACs Purdue Canada.	.20	145.00

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Name	Date	Services	Hours	Amount
Hudson, J.	8/10/21	Review insurers' motion in limine re insurance-related evidence.	.30	217.50
Hudson, J.	8/10/21	Analyze insurers' position re "neutrality" in plan.	.10	72.50
Hudson, J.	8/10/21	Review confirmation order for insurance aspects.	.80	580.00
Hudson, J.	8/10/21	Analyze approach to "neutrality" presentation at trial.	.50	362.50
Grim, E.	8/10/21	Confer with Debtors' counsel (E. Vonnegut, A. Kramer) re response to insurer motion in limine and "neutrality" proposal.	1.40	980.00
Grim, E.	8/10/21	Confer with R. Shore, K. Quinn, and C. Litherland re "neutrality" proposal.	.70	490.00
Grim, E.	8/10/21	Review plan for insurance-related treatment of IACs (0.7); draft analysis re same (0.5).	1.20	840.00
Grim, E.	8/10/21	Draft oral argument outline re plan insurance issues.	1.40	980.00
Grim, E.	8/10/21	Confer with team re confirmation status and strategy.	.50	350.00
Grim, E.	8/10/21	Review insurer motion in limine.	.40	280.00
Grim, E.	8/10/21	Revise prep outline for expert cross-examination of J. Horewitz.	.60	420.00
Grim, E.	8/10/21	Communicate with B. Kelly (Brown Rudnick) and D. Wolf re NewCo D&O procurement issues.	.20	140.00
Rubinstein, J.	8/10/21	Review insurer motion in limine (0.6); analyze confirmation schedule and anticipated witness cross-examination times (0.3); analyze revised proposed confirmation order (2.0); analysis re confirmation witnesses, including J. Horewitz (1.8).	4.70	3,760.00
Rubinstein, J.	8/10/21	Confer with bankruptcy and litigation teams re strategy.	.50	400.00
Wolf, D.	8/10/21	Confer with S. Gilbert, R. Shore, R. Leveridge, K. Quinn, J. Rubinstein, J. Hudson, H. Frazier, S. Sraders, A. Gaske, and J. Sanchez re insurance bankruptcy hearing.	.50	350.00
Wolf, D.	8/10/21	Revise plan documents re insurance coverage matters.	.90	630.00
Sanchez, J.	8/10/21	Confer with team re status of plan confirmation.	.50	187.50
Frazier, H.	8/10/21	Analyze issues re changes to plan re shareholder retained insurance claims.	.40	270.00
Leveridge, R.	8/10/21	Confer with team re confirmation hearing and status of projects related thereto.	.50	700.00
Sraders, S.	8/10/21	Confer with team re recent developments and strategy for next steps.	.50	287.50

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Name	Date	Services	Hours	Amount
Colcock, S.	8/10/21	Review Debtors' memorandum of law in support of confirmation of sixth amended joint plan of reorganization.	1.40	462.00
Gilbert, S.	8/11/21	Confer with Debtors' counsel re plan objections.	1.00	1,700.00
Gilbert, S.	8/11/21	Confer with co-counsel re plan issues.	1.00	1,700.00
Quinn, K.	8/11/21	Confer with team re support for findings (0.3); correspondence re same (0.2).	.50	550.00
Quinn, K.	8/11/21	Confer with insurers and Reed Smith re insurers motion in limine.	.50	550.00
Quinn, K.	8/11/21	Participate in call with insurers and Debtors re "neutrality" issue.	1.20	1,320.00
Quinn, K.	8/11/21	Confer with team re debrief on insurance call.	1.00	1,100.00
Quinn, K.	8/11/21	Revise draft findings.	.40	440.00
Shore, R.	8/11/21	Confer with C. Litherland, K. Quinn, E. Grim, and J. Hudson re follow-up issues from insurer "neutrality" call.	1.00	1,350.00
Shore, R.	8/11/21	Communications with J. Hudson, C. Litherland and others re stipulation re non prejudice.	.50	675.00
Shore, R.	8/11/21	Prepare for and participate in call with insurer counsel re "neutrality", other insurance issues re confirmation hearing.	2.00	2,700.00
Shore, R.	8/11/21	Analyze "neutrality", including confer with team (multiple); confer re motion in limine re J. Delconte.	2.50	3,375.00
Litherland, C.	8/11/21	Confer with J. Hudson, R. Shore, K. Quinn, and E. Grim re insurer "neutrality" discussion issues.	1.00	1,400.00
Litherland, C.	8/11/21	Revise summary of argument for confirmation findings.	.40	560.00
Litherland, C.	8/11/21	Communications with J. Hudson, R. Shore and others re stipulation re non prejudice.	.50	700.00
Litherland, C.	8/11/21	Communications with K. Quinn, J. Hudson, R. Shore and others re "neutrality" proposals.	1.10	1,540.00
Hudson, J.	8/11/21	Meet with J. Horewitz in preparation for expert testimony re confirmation.	.90	652.50
Hudson, J.	8/11/21	Review summary of argument on "neutrality" issue for confirmation.	.10	72.50
Hudson, J.	8/11/21	Analyze options for resolving objection on Del Conte declaration.	.70	507.50
Hudson, J.	8/11/21	Analyze approaches to insurance findings and arguments at confirmation.	4.90	3,552.50
Hudson, J.	8/11/21	Attend portion of call with insurers re "neutrality" provision in plan and proposed findings of fact.	.50	362.50

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Name	Date	Services	Hours	Amount
Grim, E.	8/11/21	Draft outline for oral argument re support for proposed findings.	2.50	1,750.00
Grim, E.	8/11/21	Confer with E. Kaminsky re insurance-related issues for confirmation hearing.	.30	210.00
Grim, E.	8/11/21	Confer with J. Horewitz (Gnarus) re expert prep.	.90	630.00
Grim, E.	8/11/21	Confer with insurer counsel re motion in limine.	.50	350.00
Grim, E.	8/11/21	Confer with insurer counsel re "neutrality" issues.	1.00	700.00
Grim, E.	8/11/21	Confer with C. Litherland, K. Quinn, R. Shore, and J. Hudson re follow-up issues from insurer "neutrality" call.	1.00	700.00
Grim, E.	8/11/21	Draft strategy outline re approach to confirmation.	.50	350.00
Grim, E.	8/11/21	Research insurance issue for confirmation hearing.	.50	350.00
Rubinstein, J.	8/11/21	Analysis re J. Horewitz cross-examination (1.0); review various briefs and exhibits in preparation for beginning of confirmation hearing (2.5)	3.50	2,800.00
Wolf, D.	8/11/21	Continue revising plan documents re insurance coverage matters.	1.30	910.00
Wolf, D.	8/11/21	Review issues for confirmation hearings; draft checklist re same.	.40	280.00
Wolf, D.	8/11/21	Confer with M. Plevin and counsel for other insurers, E. Vonnegut and counsel for Debtors, and counsel for various creditor groups re confirmation findings re insurance.	1.00	700.00
Frazier, H.	8/11/21	Confer with counsel for DMP group re proposed revisions to plan language.	.60	405.00
Frazier, H.	8/11/21	Confer with J. Hudson, E. Grim and J. Rubinstein re confirmation issues.	.30	202.50
Frazier, H.	8/11/21	Review proposed plan edits re DMP settlement.	.30	202.50
Rush, M.	8/11/21	Communicate with team re insurance issues for trust.	.30	202.50
Johnson, K.	8/11/21	Review bankruptcy docket for relevant plan documents.	1.00	230.00
Sraders, S.	8/11/21	Research re findings in support of confirmation.	3.10	1,782.50
Kaminsky, E.	8/11/21	Confer with E. Grim re bankruptcy confirmation.	.30	150.00
Gilbert, S.	8/12/21	Attend pre-trial conference (6.0); analyze impact of hearing (2.0).	8.00	13,600.00
Gilbert, S.	8/12/21	Analyze outstanding issues re D&O insurance.	1.00	1,700.00
Quinn, K.	8/12/21	Review revised drafts of findings language.	.40	440.00
Hudson, J.	8/12/21	Review as-filed confirmation order.	.20	145.00
Hudson, J.	8/12/21	Confer with Debtors (Davis Polk) re as-filed confirmation order.	.10	72.50

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Name	Date	Services	Hours	Amount
Hudson, J.	8/12/21	Attend day 1 of confirmation hearing (partial).	2.00	1,450.00
Hudson, J.	8/12/21	Review differences between sixth and seventh amended plans for impact on expert (J. Horewitz) analysis.	.10	72.50
Hudson, J.	8/12/21	Outline process for finalizing findings.	1.50	1,087.50
Hudson, J.	8/12/21	Prepare for presentation of evidence from expert (J. Horewitz).	.40	290.00
Hudson, J.	8/12/21	Analyze insurance implications of DMP's proposed revisions to plan.	.60	435.00
Hudson, J.	8/12/21	Provide feedback on insurers' revisions to stipulation.	.20	145.00
Grim, E.	8/12/21	Draft outline for insurance-related confirmation arguments.	1.40	980.00
Grim, E.	8/12/21	Review seventh amended plan.	.50	350.00
Grim, E.	8/12/21	Revise plan language re co-defendants.	.50	350.00
Grim, E.	8/12/21	Revise stipulation re insurer motion in limine.	.20	140.00
Grim, E.	8/12/21	Revise insurance issues relevant to oral argument.	.20	140.00
Rubinstein, J.	8/12/21	Attend confirmation hearing (partial) (3.6); analysis re J. Horewitz testimony (0.4).	4.00	3,200.00
Wolf, D.	8/12/21	Review plan documents and materials in preparation for confirmation hearing.	.50	350.00
Wolf, D.	8/12/21	Attend confirmation hearing.	6.00	4,200.00
Wolf, D.	8/12/21	Revise stipulation re Del Conte declaration re insurance matters.	.20	140.00
Frazier, H.	8/12/21	Revise plan language proposed by DMP.	.70	472.50
Johnson, K.	8/12/21	Review and organize plan-related declarations.	.80	184.00
Johnson, K.	8/12/21	Organize J. Horewitz declaration and accompanying materials.	.30	69.00
Lyle, R.	8/12/21	Analyze declarations for evidence in support (3.8); draft analysis of evidence and pincites (2.5).	6.30	1,953.00
Ogrey, S.	8/12/21	Review filings re shareholder / Sackler settlement agreement.	.20	46.00
Sraders, S.	8/12/21	Review proposed insurance-related confirmation findings.	2.60	1,495.00
Kaminsky, E.	8/12/21	Attend confirmation hearing.	6.00	3,000.00
Gilbert, S.	8/13/21	Attend confirmation hearing (6.6); analyze results of same (1.4).	8.00	13,600.00
Quinn, K.	8/13/21	Attend confirmation hearing (partial).	2.50	2,750.00
Quinn, K.	8/13/21	Review DMP request.	.30	330.00
Hudson, J.	8/13/21	Re-review J. Horewitz materials for testimony at confirmation hearing.	.60	435.00

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Hudson, J.	8/13/21	Present J. Horewitz testimony at confirmation hearing.	.20	145.00
Hudson, J.	8/13/21	Confer with Debtors (S. Massman) re options to resolve Gulf objections to confirmation.	.10	72.50
Hudson, J.	8/13/21	Analyze insurance implications of DMP proposed revisions to plan.	.20	145.00
Hudson, J.	8/13/21	Analyze options for resolving Gulf objections to confirmation.	.30	217.50
Hudson, J.	8/13/21	Draft outline of approach to resolve Gulf objections to confirmation.	.30	217.50
Hudson, J.	8/13/21	Analyze proposals for resolving insurers' motion in limine.	.40	290.00
Hudson, J.	8/13/21	Attend portion of confirmation hearing day #2.	3.30	2,392.50
Grim, E.	8/13/21	Attend confirmation hearing (partial).	4.10	2,870.00
Grim, E.	8/13/21	Draft outline for insurance-related confirmation arguments.	1.40	980.00
Grim, E.	8/13/21	Revise co-defendant-related plan provisions.	.30	210.00
Rubinstein, J.	8/13/21	Attend portion of confirmation hearing, including testimony of J. Horewitz (3.3); analysis re cites in support of confirmation order findings (0.5).	3.80	3,040.00
Wolf, D.	8/13/21	Attend confirmation hearing (partial).	1.00	700.00
Sanchez, J.	8/13/21	Review insurance "neutrality" language in past plan confirmations.	3.80	1,425.00
Frazier, H.	8/13/21	Attend confirmation hearing (partial).	1.70	1,147.50
Frazier, H.	8/13/21	Continue reviewing plan language reflecting DMP settlement issues.	.30	202.50
Frazier, H.	8/13/21	Review Debtors' comments to DMP proposed plan revisions.	3.00	2,025.00
Martinez, S.	8/13/21	Research in support of confirmation hearing.	.70	220.50
Johnson, K.	8/13/21	Draft table of contents re insurance "neutrality" briefs and related cases.	3.60	828.00
Lyle, R.	8/13/21	Draft summary of declarations.	.40	124.00
Lyle, R.	8/13/21	Analyze declaration of Collura for evidence in support (4.2); draft analysis of evidence and pincites (2.3).	6.50	2,015.00
Lyle, R.	8/13/21	Draft summary of Collura declaration.	.20	62.00
Lyle, R.	8/13/21	Continue analysis of declarations for evidence in support.	.50	155.00
Ogrey, S.	8/13/21	Organize disclosure statement re fifth amended plan for J. Horewitz cross examination.	.10	23.00
Ogrey, S.	8/13/21	Organize materials cited in "neutrality" brief and motion in limine for confirmation hearing.	1.10	253.00

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Name	Date	Services	Hours	Amount
Sraders, S.	8/13/21	Research and analyze evidence in support of confirmation in preparation for confirmation hearing.	2.70	1,552.50
Kaminsky, E.	8/13/21	Attend confirmation hearing.	6.60	3,300.00
Grim, E.	8/14/21	Draft outline for insurance-related confirmation arguments.	2.50	1,750.00
Gilbert, S.	8/15/21	Analyze issues to be resolved via DMP settlement.	.50	850.00
Hudson, J.	8/15/21	Review proposed redline of stipulation to resolve insurers' motions in limine.	.20	145.00
Hudson, J.	8/15/21	Communicate with co-counsel re day 3 of confirmation hearing.	.20	145.00
Hudson, J.	8/15/21	Review latest revisions to plan re co-defendant deal to confirm that they do not negatively impact insurance.	.30	217.50
Hudson, J.	8/15/21	Review annotated version of insurance findings to confirm remaining steps for confirmation.	.20	145.00
Hudson, J.	8/15/21	Review insurers' proposed revision to "neutrality" provision of plan.	.20	145.00
Grim, E.	8/15/21	Revise "neutrality" oral argument outline.	2.40	1,680.00
Grim, E.	8/15/21	Review insurer "neutrality" language proposal.	.20	140.00
Rubinstein, J.	8/15/21	Communications with Kramer Levin (co-counsel) and team re confirmation hearing.	.50	400.00
Frazier, H.	8/15/21	Analyze revisions to plan re DMP settlement.	.40	270.00
Frazier, H.	8/15/21	Confer with counsel for DMPs, Debtors and AHC re plan revisions to reflect DMP settlement.	.30	202.50
Sraders, S.	8/15/21	Research re requirements for plan confirmation.	1.00	575.00
Gilbert, S.	8/16/21	Attend confirmation hearing (6.0); analyze confirmation issues (2.0).	8.00	13,600.00
Shore, R.	8/16/21	Analyze "neutrality" proposal.	.70	945.00
Litherland, C.	8/16/21	Analyze insurer "neutrality" proposal and possible response to same.	1.30	1,820.00
Hudson, J.	8/16/21	Review agreement to stipulation to resolve Gulf confirmation objection re scope of prior settlement.	.10	72.50
Hudson, J.	8/16/21	Review insurers' most recent proposal re "neutrality" issue.	.30	217.50
Hudson, J.	8/16/21	Analyze insurance implications of DMP proposed revisions to plan.	.30	217.50
Grim, E.	8/16/21	Draft analysis re insurer "neutrality" language proposal.	.30	210.00
Rubinstein, J.	8/16/21	Attend portions of confirmation hearing (5.4); analysis re insurance issues (0.5).	5.90	4,720.00
Sanchez, J.	8/16/21	Review court approved confirmation agreements for relevant insurance treatment language.	2.20	825.00

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Name	Date	Services	Hours	Amount
Frazier, H.	8/16/21	Attend confirmation hearing (partial).	4.80	3,240.00
Frazier, H.	8/16/21	Analyze insurers proposed "neutrality" findings and revisions to same.	.60	405.00
Frazier, H.	8/16/21	Analyze Debtors' proposed changes to plan re DMP potential agreement.	.40	270.00
Frazier, H.	8/16/21	Confer with counsel for DMPs and Debtors re plan revisions.	.20	135.00
Martinez, S.	8/16/21	Research prior bankruptcy cases amended joint plan of reorganization in support of confirmation proceeding.	.50	157.50
Johnson, K.	8/16/21	Draft table of contents re insurance "neutrality" briefs and related cases.	2.50	575.00
Sraders, S.	8/16/21	Revise proposed findings for confirmation order.	1.40	805.00
Sraders, S.	8/16/21	Review proposed stipulation from certain objecting insurers.	.70	402.50
Sraders, S.	8/16/21	Research re requirements for confirmation.	2.90	1,667.50
Kaminsky, E.	8/16/21	Attend confirmation hearing (partial).	5.60	2,800.00
Gilbert, S.	8/17/21	Attend confirmation hearing (7.1); review confirmation / plan issues (0.9).	8.00	13,600.00
Gilbert, S.	8/17/21	Analyze DMP settlement issues.	.50	850.00
Gilbert, S.	8/17/21	Confer with co-counsel re fee issues in plan.	1.00	1,700.00
Shore, R.	8/17/21	Review state of play on "neutrality" and findings (0.5); revise note to M. Plevin re same (0.3).	.80	1,080.00
Litherland, C.	8/17/21	Communications with R. Shore, J. Hudson, and others re insurance "neutrality" proposals.	1.10	1,540.00
Hudson, J.	8/17/21	Communicate with Debtors (Reed Smith) re AHC agreement to withdraw Simmons declaration in light of resolution of insurers' motion in limine.	.10	72.50
Hudson, J.	8/17/21	Revise response to insurers' most recent proposal on "neutrality" issue.	.30	217.50
Hudson, J.	8/17/21	Confer with insurers re most recent proposal on "neutrality" issue.	.10	72.50
Hudson, J.	8/17/21	Confer with Debtors (Reed Smith) re potential options for resolving Gulf motion in limine.	.30	217.50
Hudson, J.	8/17/21	Review confirmation hearing schedule.	.10	72.50
Grim, E.	8/17/21	Continue drafting analysis re insurer "neutrality" language proposal.	.90	630.00
Grim, E.	8/17/21	Draft outline for confirmation hearing arguments.	3.90	2,730.00
Grim, E.	8/17/21	Research cases for confirmation hearing arguments.	1.40	980.00
Grim, E.	8/17/21	Attend confirmation hearing (partial).	2.90	2,030.00

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Name	Date	Services	Hours	Amount
Grim, E.	8/17/21	Review disclosure statement objections.	.30	210.00
Grim, E.	8/17/21	Confer with E. Goodman re disclosure statement objections.	.20	140.00
Grim, E.	8/17/21	Communicate with H. Frazier re DMP negotiations.	.20	140.00
Rubinstein, J.	8/17/21	Analysis re insurance "neutrality" issue.	1.00	800.00
Wolf, D.	8/17/21	Attend confirmation hearing (partial).	6.50	4,550.00
Frazier, H.	8/17/21	Attend confirmation hearing (partial).	2.10	1,417.50
Frazier, H.	8/17/21	Revise plan re DMP settlement issues.	.70	472.50
Frazier, H.	8/17/21	Confer with Debtors' counsel re revisions to plan to reflect DMP potential settlement.	.30	202.50
Sraders, S.	8/17/21	Review prior bankruptcy case filings to determine significance for Debtors' confirmation.	.90	517.50
Kaminsky, E.	8/17/21	Attend confirmation hearing.	7.10	3,550.00
Gilbert, S.	8/18/21	Attend confirmation hearing.	7.00	11,900.00
Gilbert, S.	8/18/21	Confer with Debtors re DMP settlement.	1.00	1,700.00
Gilbert, S.	8/18/21	Confer with team re insurance / confirmation strategy.	.50	850.00
Gilbert, S.	8/18/21	Analyze impact of DMP issues and plan-related issues.	2.00	3,400.00
Shore, R.	8/18/21	Review oral argument outline.	.70	945.00
Shore, R.	8/18/21	Confer with team re confirmation hearing (0.5); review proposals re findings (1.5).	2.00	2,700.00
Litherland, C.	8/18/21	Analysis of further inquiries re insurance "neutrality" and response to same.	1.30	1,820.00
Hudson, J.	8/18/21	Confer with Debtors (Davis Polk, Dechert) re insurance aspects of DMP resolution.	.40	290.00
Hudson, J.	8/18/21	Confer with team re status of confirmation hearing and litigation issues.	.50	362.50
Hudson, J.	8/18/21	Attend day 5 of confirmation hearing (partial).	.80	580.00
Hudson, J.	8/18/21	Communicate with insurer re question related "neutrality".	.10	72.50
Hudson, J.	8/18/21	Analyze next steps for "neutrality" negotiations with insurers.	.60	435.00
Hudson, J.	8/18/21	Revise outline for oral argument re insurance issues.	.80	580.00
Hudson, J.	8/18/21	Confer with Debtors (Reed Smith) re "neutrality" argument at hearing.	.10	72.50
Hudson, J.	8/18/21	Review revisions to plan implementing DMP agreement.	.30	217.50
Grim, E.	8/18/21	Draft response to insurer communication re "neutrality" proposal.	1.20	840.00

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Grim, E.	8/18/21	Draft insurance "neutrality" oral argument outline.	3.30	2,310.00
Grim, E.	8/18/21	Confer with insurance and bankruptcy teams re status of proceedings.	.50	350.00
Grim, E.	8/18/21	Confer with team re confirmation strategy.	.50	350.00
Rubinstein, J.	8/18/21	Analysis re plan confirmation procedures.	1.50	1,200.00
Wolf, D.	8/18/21	Confer with team re confirmation hearing proceedings.	.50	350.00
Frazier, H.	8/18/21	Confer with C. Steege re DMP proposed plan revisions.	.50	337.50
Frazier, H.	8/18/21	Analyze issues re potential settlement with DMPs.	1.50	1,012.50
Frazier, H.	8/18/21	Analyze Debtors' proposed revisions to plan.	.60	405.00
Frazier, H.	8/18/21	Confer with Debtors' counsel team re DMP plan revisions and settlement issues.	.50	337.50
Ogrey, S.	8/18/21	Review prior bankruptcy case plan of reorganization re assigning policies then transferring proceeds.	.20	46.00
Sraders, S.	8/18/21	Confer with team re current strategy for case and next steps.	.50	287.50
Sraders, S.	8/18/21	Revise tracking chart of confirmation findings to incorporate legal arguments.	2.00	1,150.00
Colcock, S.	8/18/21	Confer with team re status and strategy.	.50	165.00
Kaminsky, E.	8/18/21	Attend confirmation hearing (partial).	4.90	2,450.00
Gilbert, S.	8/19/21	Attend confirmation hearing (5.9); review pending confirmation issues (1.1).	7.00	11,900.00
Gilbert, S.	8/19/21	Confer with K. Eckstein re plan issues.	1.00	1,700.00
Gilbert, S.	8/19/21	Confer with H. Frazier re DMP settlement.	.40	680.00
Gilbert, S.	8/19/21	Confer with M. Kesselman re insurance for NewCo.	1.00	1,700.00
Quinn, K.	8/19/21	Review oral argument outline.	.50	550.00
Litherland, C.	8/19/21	Communications with E. Grim and others re preparation for insurance-related argument.	.20	280.00
Winstead, H.	8/19/21	Confer with Kramer Levin team re plan language re preservation of documents.	.50	475.00
Hudson, J.	8/19/21	Review revisions to plan implementing DMP agreement.	.40	290.00
Hudson, J.	8/19/21	Revise outline for oral argument re insurance issues.	.10	72.50
Grim, E.	8/19/21	Revise co-defendant plan provisions to reflect negotiations.	.50	350.00
Grim, E.	8/19/21	Revise oral argument outline.	4.40	3,080.00
Grim, E.	8/19/21	Attend confirmation hearing (partial).	.50	350.00
Rubinstein, J.	8/19/21	Review filings re confirmation.	.50	400.00
Wolf, D.	8/19/21	Revise plan documents re co-defendant objections.	1.00	700.00

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Wolf, D.	8/19/21	Attend confirmation hearing.	5.90	4,130.00
Frazier, H.	8/19/21	Continue to negotiate settlement terms and plan language with DMPs.	1.80	1,215.00
Frazier, H.	8/19/21	Revise plan re DMP settlement terms.	1.10	742.50
Frazier, H.	8/19/21	Analyze proposed changes to plan re DMP settlement.	1.60	1,080.00
Frazier, H.	8/19/21	Confer with S. Gilbert re DMP settlement terms.	.40	270.00
Frazier, H.	8/19/21	Attend confirmation hearing.	1.10	742.50
Sraders, S.	8/19/21	Research bankruptcy court jurisdiction over confirmation proceedings.	.80	460.00
Sraders, S.	8/19/21	Revise annotated findings in support of confirmation findings to incorporate legal citations.	1.20	690.00
Kaminsky, E.	8/19/21	Attend confirmation hearing.	5.90	2,950.00
Quinn, K.	8/20/21	Review draft oral argument outline.	.70	770.00
Shore, R.	8/20/21	Confer with C. Litherland, E. Grim, S. Sraders, and J. Hudson re oral argument strategy.	1.30	1,755.00
Shore, R.	8/20/21	Review plan confirmation materials.	1.00	1,350.00
Litherland, C.	8/20/21	Revise outline of insurance-related portion of argument.	1.10	1,540.00
Litherland, C.	8/20/21	Confer with E. Grim, R. Shore, J. Hudson, and S. Sraders re insurance-related argument.	1.30	1,820.00
Hudson, J.	8/20/21	Provide comments to confirmation order.	.40	290.00
Hudson, J.	8/20/21	Communicate with insurer re latest round of questions aimed at narrowing dispute at confirmation.	.30	217.50
Hudson, J.	8/20/21	Outline history of discussions with insurers on "neutrality" for reference in oral argument.	1.90	1,377.50
Hudson, J.	8/20/21	Confer with C. Litherland, R. Shore, E. Grim and S. Sraders re confirmation oral argument.	1.30	942.50
Hudson, J.	8/20/21	Revise response to insurers' objection to proposed confirmation order.	1.80	1,305.00
Hudson, J.	8/20/21	Confer with Plan Proponents group re approach to oral argument.	1.20	870.00
Hudson, J.	8/20/21	Revise outline for argument opposing insurers' objections.	.30	217.50
Hudson, J.	8/20/21	Confer with Debtors (Reed Smith) re insurance-related argument at confirmation.	.50	362.50
Grim, E.	8/20/21	Confer with Debtors' counsel (A. Kramer) and J. Hudson re prep for oral argument.	.50	350.00
Grim, E.	8/20/21	Review oral argument outline to prepare for call with Debtors' counsel (A. Kramer).	.30	210.00

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Grim, E.	8/20/21	Confer with Debtors' counsel (M. Huebner) and all Plan Proponent counsel re preparation and time allotted for oral argument.	1.20	840.00
Grim, E.	8/20/21	Confer with H. Frazier re DMP oral argument.	.30	210.00
Grim, E.	8/20/21	Confer with C. Litherland, R. Shore, J. Hudson and S. Sraders re oral argument strategy.	1.30	910.00
Grim, E.	8/20/21	Draft reply to insurer confirmation objections.	1.60	1,120.00
Grim, E.	8/20/21	Review strategy re reply to insurer confirmation objections.	.40	280.00
Grim, E.	8/20/21	Draft "neutrality" strategy outline for call with Debtors' counsel.	1.50	1,050.00
Grim, E.	8/20/21	Draft oral argument outline for "neutrality" and confirmation issues.	2.50	1,750.00
Rubinstein, J.	8/20/21	Review insurer objections to proposed confirmation order.	.80	640.00
Frazier, H.	8/20/21	Confer with Plan Proponents re argument issues for confirmation hearing.	1.20	810.00
Frazier, H.	8/20/21	Confer with E. Grim re DMP argument issues.	.30	202.50
Frazier, H.	8/20/21	Review amended plan language re DMP settlement.	.40	270.00
Frazier, H.	8/20/21	Analyze DMP remaining objection.	.30	202.50
Sraders, S.	8/20/21	Confer with C. Litherland, R. Shore, J. Hudson, and E. Grim re upcoming confirmation argument re insurance.	1.30	747.50
Sraders, S.	8/20/21	Revise draft chart summarizing factual and legal support for confirmation findings.	4.20	2,415.00
Colcock, S.	8/20/21	Cite check legal and factual citations in proposed confirmation findings.	3.20	1,056.00
Hudson, J.	8/21/21	Finalize outline of history of discussions with insurers on "neutrality" for reference in oral argument.	1.80	1,305.00
Hudson, J.	8/21/21	Revise response to insurers' objection to proposed confirmation order.	.20	145.00
Grim, E.	8/21/21	Draft reply to insurer objections to confirmation order.	7.60	5,320.00
Frazier, H.	8/21/21	Review briefing on DMP remaining objection.	1.60	1,080.00
Sraders, S.	8/21/21	Research in support of reply to insurer objection to proposed confirmation findings.	3.20	1,840.00
Quinn, K.	8/22/21	Revise draft of oral argument outline.	1.10	1,210.00
Shore, R.	8/22/21	Review brief re "neutrality" and findings and provide comments to same.	4.00	5,400.00

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Hudson, J.	8/22/21	Confer with Debtors (S. Massman) re final wording of insurance-related definitions in plan.	.70	507.50
Hudson, J.	8/22/21	Review outline for oral argument on "neutrality" issue.	.30	217.50
Hudson, J.	8/22/21	Revise reply to insurers' objection to confirmation order.	.20	145.00
Grim, E.	8/22/21	Revise oral argument outline based on new insurer objections.	2.10	1,470.00
Grim, E.	8/22/21	Revise reply to insurer objections to confirmation order.	4.90	3,430.00
Frazier, H.	8/22/21	Review draft amended plan.	.30	202.50
Frazier, H.	8/22/21	Revise plan language.	.30	202.50
Frazier, H.	8/22/21	Confer with co-counsel re plan revisions.	.40	270.00
Frazier, H.	8/22/21	Confer with counsel for Debtors re plan language revisions.	.30	202.50
Gilbert, S.	8/23/21	Attend confirmation hearing (7.9); analyze confirmation status (1.1).	9.00	15,300.00
Gilbert, S.	8/23/21	Confer with K. Maclay re trusts (0.9); confer with K. Eckstein re same (0.6).	1.50	2,550.00
Quinn, K.	8/23/21	Revise draft reply to insurance objections.	.70	770.00
Shore, R.	8/23/21	Review revised plan and proposed findings.	1.00	1,350.00
Hudson, J.	8/23/21	Confirm that insurance provisions are accurately represented in eighth amended plan.	.10	72.50
Hudson, J.	8/23/21	Finalize reply brief on insurers' objections to confirmation order.	.40	290.00
Hudson, J.	8/23/21	Analyze status of documentation re shareholder insurance transfer.	.60	435.00
Hudson, J.	8/23/21	Attend portion of confirmation hearing.	2.20	1,595.00
Grim, E.	8/23/21	Continue to revise reply to insurer objections to confirmation order.	3.10	2,170.00
Grim, E.	8/23/21	Review cases for insurance "neutrality" oral argument.	1.60	1,120.00
Grim, E.	8/23/21	Attend confirmation hearing (partial).	5.40	3,780.00
Grim, E.	8/23/21	Review Travelers objection to prepare for oral argument.	.50	350.00
Wolf, D.	8/23/21	Attend bankruptcy confirmation hearing.	7.90	5,530.00
Frazier, H.	8/23/21	Attend confirmation hearing.	5.20	3,510.00
Johnson, K.	8/23/21	Review AHC reply to plan objections.	.30	69.00
Johnson, K.	8/23/21	Review and organize insurance "neutrality" pleadings.	.20	46.00

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Name	Date	Services	Hours	Amount
Sraders, S.	8/23/21	Revise draft reply to insurer objection and supporting exhibit.	1.00	575.00
Sraders, S.	8/23/21	Research in support of oral argument for confirmation.	.80	460.00
Kaminsky, E.	8/23/21	Attend confirmation hearing.	7.90	3,950.00
Quinn, K.	8/24/21	Review oral argument time revisions and other argument-related matters.	.30	330.00
Quinn, K.	8/24/21	Review oral argument draft.	.30	330.00
Shore, R.	8/24/21	Analyze Gulf issue.	.50	675.00
Hudson, J.	8/24/21	Analyze shareholder insurance aspects of eighth amended plan.	.50	362.50
Hudson, J.	8/24/21	Confer with Debtors (DPW and Reed Smith) re resolving Gulf objection.	.90	652.50
Hudson, J.	8/24/21	Draft proposal for resolving Gulf objection.	2.00	1,450.00
Hudson, J.	8/24/21	Review changes between eighth amended plan and draft ninth amended plan.	.20	145.00
Grim, E.	8/24/21	Review cases to prepare for oral argument on "neutrality" issues.	3.20	2,240.00
Grim, E.	8/24/21	Revise oral argument outline based on comments from Debtors' counsel.	6.30	4,410.00
Grim, E.	8/24/21	Draft summary of cases for oral argument.	2.70	1,890.00
Rubinstein, J.	8/24/21	Review Debtors' and AHC's reply to Certain Insurers' objections to proposed confirmation order.	.40	320.00
Wolf, D.	8/24/21	Review revisions to ninth amended plan and shareholder settlement agreement re insurance matters.	.90	630.00
Frazier, H.	8/24/21	Prepare for oral argument re DMP objection and insurer injunction.	4.50	3,037.50
Frazier, H.	8/24/21	Confer with C. Steege and J. Gleit re DMP remaining objection.	.50	337.50
Frazier, H.	8/24/21	Revise statement re introduction of DMP remaining objection.	.30	202.50
Frazier, H.	8/24/21	Review revised plan language.	.30	202.50
Sraders, S.	8/24/21	Research issues relevant to reply to insurer confirmation order objections.	1.10	632.50
Sraders, S.	8/24/21	Research jurisdictional issues in preparation for insurer confirmation hearing arguments.	2.70	1,552.50
Gilbert, S.	8/25/21	Attend confirmation hearing.	7.50	12,750.00
Quinn, K.	8/25/21	Participate in confirmation hearing (partial).	6.20	6,820.00
Quinn, K.	8/25/21	Review language re Gulf agreement.	.70	770.00

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Name	Date	Services	Hours	Amount
Shore, R.	8/25/21	Communicate with J. Hudson and K. Quinn re Gulf agreement language.	.10	135.00
Shore, R.	8/25/21	Analyze Gulf issue raised by Judge Drain (0.9); revise plan language re same (0.6).	1.50	2,025.00
Hudson, J.	8/25/21	Confer with AHC co-counsel (Brown Rudnick) re resolving Gulf objection.	.30	217.50
Hudson, J.	8/25/21	Confer with Debtors (Reed Smith) re "neutrality" argument.	.20	145.00
Hudson, J.	8/25/21	Analyze potential revisions to plan based on Judge Drain's commentary during argument on insurance issues.	.20	145.00
Hudson, J.	8/25/21	Review ninth amended plan.	.10	72.50
Hudson, J.	8/25/21	Review revised proposed confirmation order.	.20	145.00
Hudson, J.	8/25/21	Attend final day of oral argument on confirmation issues (partial).	2.50	1,812.50
Hudson, J.	8/25/21	Revise language for confirmation order resolving Gulf objection.	2.70	1,957.50
Hudson, J.	8/25/21	Confer with Debtors (DPW and Reed Smith) re resolving Gulf objection.	.30	217.50
Hudson, J.	8/25/21	Summarize resolution letter contents and relevance for argument in support of insurance findings.	.40	290.00
Hudson, J.	8/25/21	Confer with Gulf re resolving objection.	.90	652.50
Grim, E.	8/25/21	Participate in oral argument.	7.50	5,250.00
Grim, E.	8/25/21	Revise oral argument to reflect new or potential arguments by insurer counsel.	3.50	2,450.00
Grim, E.	8/25/21	Review cases in preparation for oral argument.	1.30	910.00
Rubinstein, J.	8/25/21	Review revised plan documents (0.7); attend portions of confirmation hearing, including portion related to insurer objections to plan (2.8).	3.50	2,800.00
Wolf, D.	8/25/21	Attend confirmation hearing.	7.50	5,250.00
Sanchez, J.	8/25/21	Review background material re reorganization plans in preparation for oral argument.	.80	300.00
Frazier, H.	8/25/21	Draft outline re DMP remaining objection argument.	1.70	1,147.50
Frazier, H.	8/25/21	Attend confirmation hearing (partial).	6.50	4,387.50
Frazier, H.	8/25/21	Confer with J. Gleit re DMP reserved objection argument.	.30	202.50
Sraders, S.	8/25/21	Attend insurance oral argument portion of confirmation hearing.	1.40	805.00
Kaminsky, E.	8/25/21	Attend confirmation hearing (partial).	5.50	2,750.00
Gilbert, S.	8/26/21	Confer with K. Eckstein re allocation issues (0.6); revise Chambers conference agenda (0.4).	1.00	1,700.00

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Name	Date	Services	Hours	Amount
Quinn, K.	8/26/21	Review oral argument.	1.30	1,430.00
Quinn, K.	8/26/21	Confer with H. Frazier re Judge Drain DMP questions and hearing prep.	1.10	1,210.00
Quinn, K.	8/26/21	Correspond with team re plan changes and hearing prep.	.30	330.00
Quinn, K.	8/26/21	Review and revise changes to Gulf objection resolution.	.40	440.00
Hudson, J.	8/26/21	Analyze outstanding issues to be addressed at argument re DMP objection.	.30	217.50
Hudson, J.	8/26/21	Confer with insurers re lack of need for revisions to plan and confirmation order based on Judge Drain's ruling.	.10	72.50
Hudson, J.	8/26/21	Confirm that all insurance-related findings are stated in the plural, as ordered by Judge Drain.	.10	72.50
Hudson, J.	8/26/21	Finalize language for confirmation order resolving Gulf objection.	1.60	1,160.00
Frazier, H.	8/26/21	Confer with K. Quinn re DMP reserved objection.	1.10	742.50
Frazier, H.	8/26/21	Review plan revisions.	.20	135.00
Frazier, H.	8/26/21	Prepare for oral argument re DMP remaining objection.	1.40	945.00
Frazier, H.	8/26/21	Confer with C. Steege re DMP remaining objection.	.20	135.00
Sraders, S.	8/26/21	Review transcript from August 25, 2021 hearing.	.70	402.50
Gilbert, S.	8/27/21	Attend confirmation hearing (7.6); confer with H. Frazier re same (0.4).	8.00	13,600.00
Gilbert, S.	8/27/21	Confer with co-counsel re plan issues.	.40	680.00
Quinn, K.	8/27/21	Participate in confirmation hearing re continued argument (partial).	4.00	4,400.00
Quinn, K.	8/27/21	Revise language per hearing.	.70	770.00
Quinn, K.	8/27/21	Analyze DMP issues.	.70	770.00
Shore, R.	8/27/21	Review insurance "neutrality" language.	.40	540.00
Hudson, J.	8/27/21	Review insurers' requested edits to plan and confirmation order based on purported statements by Judge Drain at hearing.	.40	290.00
Wolf, D.	8/27/21	Review revisions to tenth amended plan and shareholder settlement agreement re insurance matters.	.80	560.00
Wolf, D.	8/27/21	Attend confirmation hearing (partial).	1.80	1,260.00
Frazier, H.	8/27/21	Continue preparing for oral argument on DMP remaining objections.	1.30	877.50
Frazier, H.	8/27/21	Confer with J. Gleit re DMP reserved objection.	.80	540.00
Frazier, H.	8/27/21	Appear for hearing re confirmation issues (partial).	1.70	1,147.50

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Name	Date	Services	Hours	Amount
Frazier, H.	8/27/21	Confer with S. Gilbert re next steps re DMP settlement.	.40	270.00
Frazier, H.	8/27/21	Review revised draft confirmation order.	.20	135.00
Frazier, H.	8/27/21	Confer with Debtors' counsel and S. Gilbert re DMP remaining objection.	.40	270.00
Ogrey, S.	8/27/21	Review tenth amended plan of reorganization.	.10	23.00
Kaminsky, E.	8/27/21	Attend confirmation hearing (partial)	2.00	1,000.00
Gilbert, S.	8/28/21	Confer with S. Birnbaum re DMP issues.	1.00	1,700.00
Hudson, J.	8/28/21	Analyze options for addressing DMP insurance issue.	.60	435.00
Grim, E.	8/28/21	Communicate with H. Frazier re DMP negotiations.	.40	280.00
Grim, E.	8/28/21	Review new insurance-related plan revisions.	.30	210.00
Frazier, H.	8/28/21	Analyze issues re resolution of DMP remaining objection.	2.30	1,552.50
Leveridge, R.	8/28/21	Communications with S. Gilbert re insurance issues raised by Court.	.40	560.00
Gilbert, S.	8/29/21	Confer with co-counsel re DMP and plan issues.	1.50	2,550.00
Quinn, K.	8/29/21	Confer with team re DMP issue.	1.20	1,320.00
Quinn, K.	8/29/21	Confer with R. Shore and H. Frazier re DMP issue.	.70	770.00
Quinn, K.	8/29/21	Correspond with team re revised plan language related to injunction and findings.	1.10	1,210.00
Shore, R.	8/29/21	Confer with K. Quinn and H. Frazier re DMP issue.	.70	945.00
Shore, R.	8/29/21	Confer with K. Quinn, H. Frazier, and J. Hudson re DMP settlement and related plan issues.	1.20	1,620.00
Shore, R.	8/29/21	Review materials and analyze DMP issues.	2.00	2,700.00
Shore, R.	8/29/21	Review revised plan language re "neutrality".	.70	945.00
Hudson, J.	8/29/21	Analyze options for addressing DMP insurance issue (1.6); confer with team re same (1.2).	2.80	2,030.00
Hudson, J.	8/29/21	Communicate with S. Sraders re researching purported scope of pending Congressional bill.	.40	290.00
Hudson, J.	8/29/21	Redline plan to address edits required based on August 27 hearing.	1.70	1,232.50
Frazier, H.	8/29/21	Review status of DMP deal and remaining objection.	1.10	742.50
Frazier, H.	8/29/21	Confer with R. Shore and K. Quinn re DMP settlement and related plan issues.	.70	472.50
Frazier, H.	8/29/21	Confer with S. Gilbert, K. Quinn, R. Shore, and J. Hudson re DMP settlement and related plan issues.	1.20	810.00
Frazier, H.	8/29/21	Revise plan language to reflect strategic approach to DMP insurance issue.	.60	405.00

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Name	Date	Services	Hours	Amount
Frazier, H.	8/29/21	Review various revisions to insurer injunction language in plan.	.50	337.50
Frazier, H.	8/29/21	Communications with team re revisions to plan to reflect strategic approach to DMP objection.	.60	405.00
Frazier, H.	8/29/21	Analyze Warren act and implications of same re confirmation.	.70	472.50
Leveridge, R.	8/29/21	Participate in meetings re insurance issues (2.1); review communications from K. Eckstein and S. Gilbert re same (0.8).	2.90	4,060.00
Sraders, S.	8/29/21	Research re potential scope of proposed legislation re non-debtor releases.	3.50	2,012.50
Gilbert, S.	8/30/21	Confer with team re status and strategy.	.50	850.00
Gilbert, S.	8/30/21	Confer with Debtors re DMP issues.	1.30	2,210.00
Gilbert, S.	8/30/21	Confer with C. Mehri re plan issues.	1.00	1,700.00
Quinn, K.	8/30/21	Confer with Kramer Levin (co-counsel) and team re changes to plan per hearing.	1.40	1,540.00
Quinn, K.	8/30/21	Confer with team re open items.	.50	550.00
Quinn, K.	8/30/21	Review further revised draft DMP language.	.20	220.00
Shore, R.	8/30/21	Confer with team re DMP issues (1.2); review draft language re same (1.8).	3.00	4,050.00
Hudson, J.	8/30/21	Confer with team re finalizing and following confirmation.	.50	362.50
Hudson, J.	8/30/21	Confer with insurer counsel (Gulf) re confirming wording resolving dispute.	.10	72.50
Hudson, J.	8/30/21	Revise Section 5.10 based on discussions with insurers.	.50	362.50
Hudson, J.	8/30/21	Confer with insurers re revisions to Section 5.10.	.10	72.50
Hudson, J.	8/30/21	Confer with AHC co-counsel (Kramer Levin) re resolving final issues for confirmation.	.60	435.00
Hudson, J.	8/30/21	Analyze scope of pending Congressional bill.	.50	362.50
Hudson, J.	8/30/21	Analyze options for resolving outstanding DMP insurance issue.	1.00	725.00
Hudson, J.	8/30/21	Revise plan to resolve outstanding DMP insurance issue.	.20	145.00
Hudson, J.	8/30/21	Confer with Debtors (Davis Polk) re revisions to plan to resolve outstanding DMP insurance issue.	1.10	797.50
Grim, E.	8/30/21	Confer with team re post-confirmation strategy.	.50	350.00
Grim, E.	8/30/21	Review proposed legislation re third-party releases (0.4); draft analysis re same (0.5).	.90	630.00
Grim, E.	8/30/21	Confer with co-counsel (K. Eckstein, R. Ringer) re plan revisions relating to co-defendants.	1.30	910.00

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Name	Date	Services	Hours	Amount
Grim, E.	8/30/21	Revise insurer language re "neutrality" provision and confirmation order findings.	.20	140.00
Rubinstein, J.	8/30/21	Confer with team re post-confirmation strategy.	.50	400.00
Wolf, D.	8/30/21	Confer with S. Gilbert, R. Leveridge, K. Quinn, J. Rubinstein, J. Hudson, H. Frazier, S. Sraders, A. Gaske, and J. Sanchez re insurance recovery strategy.	.50	350.00
Wolf, D.	8/30/21	Review proposed amendments to eleventh amended plan re insurance coverage matters.	.90	630.00
Sanchez, J.	8/30/21	Confer with team re oral argument.	.50	187.50
Frazier, H.	8/30/21	Confer with Kramer Levin and Gilbert teams re DMP settlement issues.	.90	607.50
Frazier, H.	8/30/21	Analyze co-defendant issues re insurance rights and related plan language.	2.20	1,485.00
Frazier, H.	8/30/21	Analyze post-confirmation application of potential legislation.	.70	472.50
Frazier, H.	8/30/21	Analyze effects of later enacted legislation post confirmation.	.40	270.00
Frazier, H.	8/30/21	Analyze plan revisions re insurance "neutrality" language.	.20	135.00
Frazier, H.	8/30/21	Confer with counsel for Debtors re revisions to proposed language re DMP remaining objection.	.40	270.00
Gaske, A.	8/30/21	Confer with team re strategy for finalizing and following confirmation.	.50	287.50
Leveridge, R.	8/30/21	Confer with Kramer Levin (K. Eckstein, R. Ringer) re insurance issues raised by Judge Drain.	.90	1,260.00
Leveridge, R.	8/30/21	Confer with team re status of proceedings.	.50	700.00
Sraders, S.	8/30/21	Confer with team re status of plan negotiations and strategy for next steps.	.50	287.50
Sraders, S.	8/30/21	Draft summary of conclusions re proposed legislation re non-debtor releases.	.70	402.50
Gilbert, S.	8/31/21	Confer with K. Quinn and H. Frazier re DMP issues.	1.10	1,870.00
Quinn, K.	8/31/21	Confer with S. Gilbert and H. Frazier re DMP objection.	1.10	1,210.00
Quinn, K.	8/31/21	Confer with Debtors and H. Frazier re DMP objection.	.80	880.00
Quinn, K.	8/31/21	Follow up call with Debtors re DMP objection.	.70	770.00
Quinn, K.	8/31/21	Review materials re plan objection.	1.00	1,100.00
Hudson, J.	8/31/21	Review revised insurance-related language in updated version of confirmation order.	.10	72.50
Hudson, J.	8/31/21	Analyze scope of pending Congressional bill.	.10	72.50

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Name	Date	Services	Hours	Amount
Hudson, J.	8/31/21	Begin drafting update letter to insurers re confirmation.	.10	72.50
Hudson, J.	8/31/21	Participate in continued negotiations with DMPs re resolving insurance issues via plan revisions.	1.10	797.50
Grim, E.	8/31/21	Review co-defendant-related plan revisions.	.20	140.00
Grim, E.	8/31/21	Review supplemental objection from US Trustee.	.10	70.00
Wolf, D.	8/31/21	Review proposed amendments to eleventh amended plan re insurance coverage matters (1.9); confer with counsel for Debtors re same (0.8).	2.70	1,890.00
Frazier, H.	8/31/21	Review proposed language and potential collateral effects on D&O related coverage and releases.	1.00	675.00
Frazier, H.	8/31/21	Confer with counsel for Debtors and certain DMPs re proposed revisions to plan.	.40	270.00
Frazier, H.	8/31/21	Confer with Debtors' counsel re DMP agreement issues (numerous communications).	1.30	877.50
Frazier, H.	8/31/21	Analyze potential revisions to plan and other documents re DMP settlement issues.	1.70	1,147.50
Frazier, H.	8/31/21	Confer with counsel for Debtors re DMP settlement issues.	.80	540.00
Frazier, H.	8/31/21	Confer with S. Gilbert and K. Quinn re DMP issues.	1.10	742.50
Frazier, H.	8/31/21	Review DMP objection re insurance issues.	.60	405.00
Sraders, S.	8/31/21	Communicate with S. Gilbert re proposed legislation re non-debtor releases.	.40	230.00
Project Total:			846.80	\$ 720,294.50

A020: Insurance Adversary Proceeding

Name	Date	Services	Hours	Amount
Rubinstein, J.	8/01/21	Communicate with Debtors' counsel re responses and objections to various sets of insurer discovery served on plaintiffs.	.20	160.00
Shore, R.	8/02/21	Confer with J. Hudson re collateral rollover issue.	.50	675.00
Hudson, J.	8/02/21	Confer with Debtors (A. Kramer, Reed Smith) re resolving final motion for more definite statement.	.30	217.50
Rubinstein, J.	8/02/21	Communications with Debtors' counsel re database access (0.3); analysis re policy production (0.3).	.60	480.00
Bonesteel, A.	8/02/21	Analyze production volume 1.	1.00	315.00
Gaske, A.	8/02/21	Analyze certain provisions of policies issued by Insurers #6 and #24 (2.1); draft summary of certain policy provisions (1.0).	3.10	1,782.50

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Name	Date	Services	Hours	Amount
Leveridge, R.	8/02/21	Review communications with co-counsel re discovery (0.2); review communication from P. Breene re Marsh production (0.2).	.40	560.00
Rubinstein, J.	8/03/21	Communications with Debtors' counsel re document database issues (0.2); communicate with Debtors' counsel re discovery responses to insurer requests (1.0); communicate with Debtors' counsel re protective order issues (0.2); review correspondence re Marsh production (0.2).	1.60	1,280.00
Bonesteel, A.	8/03/21	Compare produced policies and policies approved for production.	2.50	787.50
Leveridge, R.	8/03/21	Review communication from Court re protective order (0.3); communications with co-counsel and opposing counsel re same (0.5).	.80	1,120.00
Leveridge, R.	8/03/21	Review proposed responses to discovery from Debtors' counsel.	.70	980.00
Rubinstein, J.	8/04/21	Revise responses to insurer requests for production (0.9); confer with Debtors' counsel re same (0.5); confer with Debtors' counsel re protective order issue (0.2).	1.60	1,280.00
Rush, M.	8/04/21	Revise discovery responses.	1.00	675.00
Rush, M.	8/04/21	Confer with Debtors' counsel re document request responses.	.50	337.50
Leveridge, R.	8/04/21	Communicate with co-counsel re discovery responses and hearing on protective order.	.90	1,260.00
Leveridge, R.	8/04/21	Review proposed edits to discovery responses.	.80	1,120.00
Kaminsky, E.	8/04/21	Draft response to insurer objection.	1.90	950.00
Shore, R.	8/05/21	Confer with R. Leveridge, S. Sraders, J. Hudson, M. Rush, A. Gaske, and A. Bonesteel re adversary proceeding status.	.30	405.00
Hudson, J.	8/05/21	Confer with team re litigation status and strategy.	.30	217.50
Hudson, J.	8/05/21	Revise summary of policy period position re National Union motion.	.10	72.50
Hudson, J.	8/05/21	Revise responses to insurers' document requests.	.20	145.00
Rubinstein, J.	8/05/21	Analysis re responses to insurer document requests.	.50	400.00
Rush, M.	8/05/21	Confer with team re case status and strategy.	.30	202.50
Bonesteel, A.	8/05/21	Confer with R. Leveridge, J. Hudson, M. Rush, A. Gaske, E. Kaminsky, S. Colcock and K. Johnson re status and strategy.	.30	94.50
Gaske, A.	8/05/21	Confer with team re insurance recovery strategy.	.30	172.50
Gaske, A.	8/05/21	Review documents produced by insurers.	.50	287.50
Leveridge, R.	8/05/21	Confer with team re litigation tasks.	.30	420.00

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Name	Date	Services	Hours	Amount
Sraders, S.	8/05/21	Confer with R. Shore, R. Leveridge, J. Hudson, M. Rush, A. Gaske, and A. Bonesteel re current status of adversary proceeding.	.20	115.00
Rubinstein, J.	8/06/21	Revise discovery responses (3.1); communicate with insurer counsel re response date extension (0.4).	3.50	2,800.00
Rush, M.	8/06/21	Review draft responses to discovery requests.	2.00	1,350.00
Bonesteel, A.	8/06/21	Prepare outgoing production log.	1.00	315.00
Leveridge, R.	8/06/21	Review communications with Debtors' counsel and opposing counsel re responses to document requests (0.4); review edits to same (0.7).	1.10	1,540.00
Leveridge, R.	8/06/21	Participate in telephonic hearing re dispute over proposed protective order (0.4); communications with co-counsel re same (0.2).	.60	840.00
Shore, R.	8/08/21	Revise discovery responses received from insurers.	3.50	4,725.00
Rubinstein, J.	8/08/21	Review R. Shore edits to Debtors' responses to discovery requests from insurers.	.40	320.00
Shore, R.	8/09/21	Review agenda for pretrial conference.	.10	135.00
Shore, R.	8/09/21	Analyze discovery responses.	1.00	1,350.00
Shore, R.	8/09/21	Confer with team re non-prejudice issues.	.30	405.00
Hudson, J.	8/09/21	Confer with team re litigation status and strategy.	.30	217.50
Hudson, J.	8/09/21	Confer with Debtors (A. Kramer, Reed Smith) re resolving final motion for more definite statement.	.30	217.50
Rubinstein, J.	8/09/21	Revise responses to insurers' first set of document request (2.7); confer with Debtors' counsel re same (0.5); confer with litigation team re strategy (0.3).	3.50	2,800.00
Rush, M.	8/09/21	Analyze responses to discovery.	.90	607.50
Rush, M.	8/09/21	Revise discovery responses.	4.00	2,700.00
Rush, M.	8/09/21	Confer with Debtors' counsel re responses to requests for production.	.50	337.50
Rush, M.	8/09/21	Confer with team re case status and strategy.	.30	202.50
Martinez, S.	8/09/21	Confer with J. Rubinstein, A. Bonesteel, S. Sraders, J. Hudson, E. Kaminsky, K. Johnson, S. Colcock, and A. Gaske re status and strategy.	.30	94.50
Johnson, K.	8/09/21	Confer with J. Hudson, J. Rubinstein, R. Leveridge, M. Rush, A. Gaske, S. Sraders, S. Colcock and A. Bonesteel re case status.	.30	69.00
Bonesteel, A.	8/09/21	Confer with team re case status.	.30	94.50
Bonesteel, A.	8/09/21	Review status of policy comparison and review..	.30	94.50
Gaske, A.	8/09/21	Confer with team re litigation status.	.30	172.50

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Name	Date	Services	Hours	Amount
Leveridge, R.	8/09/21	Review edits and comments from R. Shore to responses to discovery requests (0.6); communications with Debtors' counsel re same (0.8); revise same for transmission to Debtors' counsel (1.8).	3.20	4,480.00
Leveridge, R.	8/09/21	Confer with team re litigation status.	.30	420.00
Sraders, S.	8/09/21	Confer with R. Leveridge, J. Rubinstein, J. Hudson, M. Rush, A. Gaske, S. Colcock, K. Johnson, and A. Bonesteel re next steps for insurance recovery.	.30	172.50
Colcock, S.	8/09/21	Confer with litigation team (R. Leveridge, M. Rush, J. Rubinstein, J. Hudson and K. Johnson) and insurance team (A. Gaske, S. Sraders and E. Kaminsky) re status and strategy.	.30	99.00
Kaminsky, E.	8/09/21	Confer with team re litigation status.	.30	150.00
Shore, R.	8/10/21	Review discovery requests.	.20	270.00
Hudson, J.	8/10/21	Finalize summary for National Union re potential resolution of motion for more definite statement.	.40	290.00
Hudson, J.	8/10/21	Review sufficiency of initial policy production.	.40	290.00
Rubinstein, J.	8/10/21	Revise discovery responses (1.6); communicate with Debtors' counsel re same (0.4); confer with A. Bonesteel and M. Rush re policy production issue (0.4).	2.40	1,920.00
Rush, M.	8/10/21	Revise discovery responses.	.70	472.50
Rush, M.	8/10/21	Confer with J. Rubinstein and A. Bonesteel re policy evidence.	.40	270.00
Bonesteel, A.	8/10/21	Review Debtors' productions and compare policy evidence.	2.00	630.00
Bonesteel, A.	8/10/21	Confer with J. Rubinstein and M. Rush re Debtors' productions and compare policy evidence.	.40	126.00
Bonesteel, A.	8/10/21	Prepare Debtors' policies to provide to insurance counsel.	1.60	504.00
Gaske, A.	8/10/21	Analyze insurance recovery status and strategy.	.40	230.00
Leveridge, R.	8/10/21	Continue revising discovery responses (1.3); communicate with Debtors' counsel re same (0.4); review additional discovery from insurers (0.9).	2.60	3,640.00
Colcock, S.	8/10/21	Communicate with J. Rubinstein re Certain Canadian Municipality creditors and Canadian First Nation creditors.	.20	66.00
Colcock, S.	8/10/21	Communicate with M. Rush re responses to insurer discovery demands.	.20	66.00
Kaminsky, E.	8/10/21	Revise draft memorandum re motion for more definite statement.	.40	200.00
Shore, R.	8/11/21	Analyze next steps for insurance recovery.	.20	270.00

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Name	Date	Services	Hours	Amount
Hudson, J.	8/11/21	Finalize and send summary of policy period position to resolve National Union motion.	.10	72.50
Rush, M.	8/11/21	Review insurers' motion to strike.	.30	202.50
Colcock, S.	8/11/21	Review Certain Insurers' motion in limine to exclude evidence related solely to insurance coverage.	.50	165.00
Shore, R.	8/12/21	Confer with team re next steps for insurance recovery.	.50	675.00
Hudson, J.	8/12/21	Confer with team (portion) re status and strategy.	.30	217.50
Rubinstein, J.	8/12/21	Confer with team re strategy (0.5); analyze multiple sets of pending discovery requests (1.6); confer with Debtors' insurance counsel, R. Leveridge, and M. Rush re responses to same (0.7).	2.80	2,240.00
Rush, M.	8/12/21	Review discovery requests served by insurers.	.90	607.50
Rush, M.	8/12/21	Confer with team re case status and strategy.	.50	337.50
Rush, M.	8/12/21	Confer with Reed Smith re discovery requests.	.80	540.00
Johnson, K.	8/12/21	Confer with team (J. Hudson, R. Leveridge, J. Rubinstein, M. Rush, A. Gaske, E. Kaminsky, and S. Colcock) re case status.	.50	115.00
Gaske, A.	8/12/21	Confer with team re insurance recovery strategy and assignments.	.50	287.50
Leveridge, R.	8/12/21	Confer with team re case status and strategy (0.5); confer with co-counsel re responses to outstanding insurer discovery (1.2).	1.70	2,380.00
Colcock, S.	8/12/21	Confer with litigation (R. Leveridge, M. Rush, J. Rubinstein, J. Hudson and K. Johnson) and insurance analysis team (A. Gaske and E. Kaminsky) re status and strategy.	.50	165.00
Colcock, S.	8/12/21	Communicate with A. Bonesteel re third-party discovery.	.20	66.00
Kaminsky, E.	8/12/21	Confer with team re litigation update.	.50	250.00
Leveridge, R.	8/13/21	Review draft responses to insurer discovery received from Debtors' counsel.	.70	980.00
Hudson, J.	8/16/21	Analyze impact of case developments on insurance litigation budget.	.10	72.50
Rubinstein, J.	8/16/21	Revise multiple sets of discovery responses served by insurers upon plaintiffs.	2.60	2,080.00
Bonesteel, A.	8/16/21	Review Debtors' productions and compare policy evidence.	5.50	1,732.50
Leveridge, R.	8/16/21	Review and revise four sets of responses to insurer discovery.	2.10	2,940.00
Hudson, J.	8/17/21	Review National Union's request for extension of discovery response deadline.	.20	145.00

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Name	Date	Services	Hours	Amount
Bonesteel, A.	8/17/21	Continue reviewing Debtors' productions and compare policy evidence.	5.70	1,795.50
Gaske, A.	8/17/21	Review status of discovery.	.20	115.00
Gaske, A.	8/17/21	Communicate with J. Hudson and K. Johnson re insurer interrogatory response deadline.	.20	115.00
Leveridge, R.	8/17/21	Revise discovery requests (0.9); prepare for potential meet-and-confer re responses from insurers (0.4); revise proposed responses to requests for admissions, interrogatories and requests for productions (0.9).	2.20	3,080.00
Shore, R.	8/18/21	Confer with team re discovery issues, including request for admissions re Mahoney affidavit.	.30	405.00
Hudson, J.	8/18/21	Communicate with National Union re request for extension of discovery response deadline.	.20	145.00
Hudson, J.	8/18/21	Revise draft responses to discovery requests.	1.60	1,160.00
Rubinstein, J.	8/18/21	Revise discovery responses served by multiple insurer entities.	1.20	960.00
Wolf, D.	8/18/21	Confer with R. Shore, R. Leveridge, J. Rubinstein, J. Hudson, S. Sraders, and A. Gaske re insurance adversary proceeding.	.30	210.00
Martinez, S.	8/18/21	Confer with R. Leveridge, J. Rubinstein, J. Hudson, S. Sraders, K. Johnson S. Colcock, R. Shore, D. Wolf and A. Gaske re status and strategy	.30	94.50
Johnson, K.	8/18/21	Confer with R. Shore, R. Leveridge, J. Hudson, J. Rubinstein, D. Wolf, A. Gaske, S. Sraders, S. Colcock, and S. Martinez re status and strategy.	.30	69.00
Gaske, A.	8/18/21	Confer with team re insurance recovery strategy and tasks.	.30	172.50
Gaske, A.	8/18/21	Review interrogatories.	.30	172.50
Leveridge, R.	8/18/21	Revise responses to discovery requests from insurers (2.5); communications with co-counsel re same (0.6).	3.10	4,340.00
Leveridge, R.	8/18/21	Confer with team re status of adversary proceeding.	.30	420.00
Sraders, S.	8/18/21	Confer with litigation team re status of adversary proceeding.	.30	172.50
Hudson, J.	8/19/21	Confer with J. Guard re discovery responses.	.10	72.50
Hudson, J.	8/19/21	Revise discovery responses.	.10	72.50
Rubinstein, J.	8/19/21	Revise discovery responses,	1.00	800.00
Bonesteel, A.	8/19/21	Continue to review Debtors' productions and comparison of policy evidence.	2.10	661.50
Leveridge, R.	8/19/21	Review and revise responses to discovery from Navigators (1.7); communications with co-counsel re same (0.4).	2.10	2,940.00

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Name	Date	Services	Hours	Amount
Leveridge, R.	8/19/21	Review communications re-entry of protective order (0.3); communications with co-counsel re status of production of documents now that protective order entered (0.5).	.80	1,120.00
Leveridge, R.	8/19/21	Review draft responses to AGLIC requests for admissions and interrogatories.	1.60	2,240.00
Shore, R.	8/20/21	Confer with J. Hudson, J. Rubinstein, R. Leveridge, K. Johnson, A. Gaske, and S. Martinez re status and strategy.	.30	405.00
Shore, R.	8/20/21	Confer with litigation team re discovery.	.20	270.00
Shore, R.	8/20/21	Review discovery responses; consider same; provide comments/edits to team.	2.00	2,700.00
Hudson, J.	8/20/21	Confer with J. Guard (AHC) and R. Leveridge re discovery responses.	.30	217.50
Hudson, J.	8/20/21	Confer with litigation team re discovery.	.20	145.00
Hudson, J.	8/20/21	Revise discovery responses.	.30	217.50
Hudson, J.	8/20/21	Confer with National Union's counsel re deadline to respond to discovery requests.	.10	72.50
Rubinstein, J.	8/20/21	Review revised responses to insurer sets of interrogatories and requests for admission served on Debtors' and plaintiffs (1.3); review R. Shore edits re same (0.3); analysis re document production issues (0.5); begin review of various insurers' responses to plaintiffs' first set of interrogatories (0.3).	2.40	1,920.00
Rubinstein, J.	8/20/21	Confer with team re discovery.	.20	160.00
Johnson, K.	8/20/21	Confer with J. Hudson, J. Rubinstein, R. Leveridge, R. Shore, A. Gaske, and S. Martinez re status and strategy.	.20	46.00
Gaske, A.	8/20/21	Review which insurers withheld production of documents prior to protective order;	.60	345.00
Gaske, A.	8/20/21	Confer with litigation team re discovery.	.20	115.00
Leveridge, R.	8/20/21	Revise draft responses to requests for admissions from AGLIC (3.9); communicate with team re same (0.8); review communications with client re protocol for responding to discovery on behalf of client (0.6); communications with co-counsel re entry of protective order (0.3); review interrogatory responses from various insurer defendants (0.6).	6.20	8,680.00
Leveridge, R.	8/20/21	Confer with team re status of litigation projects, confirmation hearing, and other topics.	.60	840.00
Sraders, S.	8/20/21	Confer with litigation team re current status of proceedings and strategy for next steps.	.20	115.00
Hudson, J.	8/21/21	Revise responses to discovery requests.	.10	72.50

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Name	Date	Services	Hours	Amount
Leveridge, R.	8/21/21	Review material relating to AGLIC requests for admissions (2.0); revise responses to same (0.9); communications with co-counsel re same (0.4).	3.30	4,620.00
Shore, R.	8/22/21	Review draft discovery responses and provide comments to same.	2.00	2,700.00
Hudson, J.	8/22/21	Revise discovery responses.	.40	290.00
Rubinstein, J.	8/22/21	Review proposed edits to discovery responses.	1.00	800.00
Leveridge, R.	8/22/21	Continue to revise responses to AGLIC requests for admissions (1.8); communications with co-counsel re same (0.4).	2.20	3,080.00
Hudson, J.	8/23/21	Confer with Debtors (Reed Smith) re responses to requests for admission.	.70	507.50
Hudson, J.	8/23/21	Communicate with litigation team re insurers' responses to plaintiffs' discovery requests.	.10	72.50
Hudson, J.	8/23/21	Revise responses to requests for admission.	.10	72.50
Rubinstein, J.	8/23/21	Review revisions to discovery responses (0.8); communications with Debtors' counsel re same (0.5).	1.30	1,040.00
Johnson, K.	8/23/21	Review and organize defendant responses to plaintiffs' first set of interrogatories.	.30	69.00
Leveridge, R.	8/23/21	Continue revising responses to AGLIC requests for admissions (3.1); communications co-counsel re same (0.5).	3.60	5,040.00
Leveridge, R.	8/23/21	Communicate with team re status of document productions and responses to interrogatories by insurers.	.40	560.00
Rubinstein, J.	8/24/21	Continue review of insurer responses to plaintiffs' first set of interrogatories (0.7); analysis re broker responses to insurer subpoenas (1.3); outline next steps re offensive discovery (0.5); confer with R. Leveridge and M. Rush re discovery issues (0.3).	2.80	2,240.00
Rush, M.	8/24/21	Communications with co-counsel re outstanding discovery	.20	135.00
Rush, M.	8/24/21	Confer with J. Rubinstein and R. Leveridge re outstanding discovery subpoenas.	.30	202.50
Johnson, K.	8/24/21	Review and organize insurer requests and compare with plaintiff responses.	.30	69.00
Leveridge, R.	8/24/21	Review communications from co-counsel re verifications of interrogatories.	.10	140.00
Leveridge, R.	8/24/21	Communications with J. Rubinstein and M. Rush re status of outstanding discovery from insurers (0.3); review subpoenas to Marsh and AON (0.7); communications with Debtors' counsel and UCC counsel re same (0.4).	1.40	1,960.00

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Name	Date	Services	Hours	Amount
Rubinstein, J.	8/25/21	Analysis re policy production (0.2); analysis re Aon and Marsh subpoenas issued by insurers (0.4); analysis re coverage charts as relates to non-arbitration insurers (0.3); analysis re issues relevant to offensive discovery (0.3); begin analysis of historic correspondence between plaintiffs and non-arbitration insurers (0.6).	1.80	1,440.00
Martinez, S.	8/25/21	Confer with A. Gaske re coverage chart and related issues.	.20	63.00
Martinez, S.	8/25/21	Draft current status of discovery.	.70	220.50
Martinez, S.	8/25/21	Review Intralinks database for potential insurance-related materials for review.	.80	252.00
Martinez, S.	8/25/21	Review and organize insurer correspondence re discovery preparation.	1.10	346.50
Martinez, S.	8/25/21	Review and revise CGL coverage charts to reflect current insurers in proceedings.	.20	63.00
Gaske, A.	8/25/21	Confer with S. Martinez re updated coverage chart and discovery-related issues.	.20	115.00
Gaske, A.	8/25/21	Draft portion of chart re analysis of insurer interrogatory responses.	1.20	690.00
Gaske, A.	8/25/21	Review prior insurer correspondence.	1.50	862.50
Leveridge, R.	8/25/21	Analyze outstanding issues re discovery responses (1.3); review communications re coverage charts (0.4).	1.70	2,380.00
Ogrey, S.	8/25/21	Review American Guarantee, Steadfast, Aspen, and Gulf's responses to plaintiffs first set of interrogatories.	1.00	230.00
Shore, R.	8/26/21	Confer with R. Leveridge, J. Rubinstein, S. Colcock, J. Hudson, A. Gaske. S. Sraders and E. Kaminsky re status and strategy.	.50	675.00
Shore, R.	8/26/21	Analyze next steps for insurance recovery.	.30	405.00
Hudson, J.	8/26/21	Confer with team re litigation status and strategy.	.50	362.50
Rubinstein, J.	8/26/21	Continue analysis of historic correspondence with non-arbitration insurers as relates to offensive discovery (3.9); analysis re broker subpoena responses (0.2); communication with Debtors' counsel re same (0.2). confer with litigation team re strategy (0.5); communicate with Debtors' counsel re document production status (0.1).	4.90	3,920.00
Martinez, S.	8/26/21	Finalize review and revision of CGL coverage charts to reflect current insurers in proceedings.	1.60	504.00
Bonesteel, A.	8/26/21	Review Debtors' productions and compare policy evidence.	2.00	630.00

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Name	Date	Services	Hours	Amount
Gaske, A.	8/26/21	Confer with litigation team re discovery and next steps.	.50	287.50
Leveridge, R.	8/26/21	Communications with co-counsel re status of Debtors' document production (0.7); communicate with team re status of discovery responses from insurers and third parties (0.7); review communication from co-counsel re communication with Marsh re discovery (0.4); confer with team re status of litigation projects and status (0.5).	2.30	3,220.00
Ogrey, S.	8/26/21	Continue review of Gulf, Navigators, and XL America answers to plaintiffs' interrogatories.	1.00	230.00
Sraders, S.	8/26/21	Confer with team re status of adversary proceedings.	.50	287.50
Colcock, S.	8/26/21	Confer with R. Leveridge, J. Rubinstein, R. Shore, J. Hudson, A. Gaske. S. Sraders and E. Kaminsky re status and strategy.	.50	165.00
Hudson, J.	8/27/21	Confer with team re outstanding issues in adversary proceeding.	.40	290.00
Rubinstein, J.	8/27/21	Communications with AON and Debtors' counsel re subpoena response (0.2); analysis re status of insurer entity responses to plaintiffs' first set of interrogatories (0.6); continue review of historic communications with non-arbitration insurers (2.0).	2.80	2,240.00
Rubinstein, J.	8/27/21	Confer with team re status of adversary proceeding.	.40	320.00
Wolf, D.	8/27/21	Confer with R. Leveridge, J. Rubinstein, J. Hudson, M. Rush, S. Sraders, A. Gaske re insurance recovery strategy.	.40	280.00
Rush, M.	8/27/21	Confer with team re outstanding issues in adversary proceeding.	.40	270.00
Martinez, S.	8/27/21	Confer with R. Leveridge, M. Rush, J. Rubinstein, S. Sraders, E. Kaminsky, J. Hudson, S. Colcock, D. Wolf and A. Gaske) re status and strategy.	.40	126.00
Martinez, S.	8/27/21	Finalize CGL coverage charts to reflect current insurers in proceedings.	.70	220.50
Gaske, A.	8/27/21	Confer with litigation team re outstanding issues in adversary proceeding.	.40	230.00
Gaske, A.	8/27/21	Review insurer interrogatory responses re deficient responses.	1.10	632.50
Gaske, A.	8/27/21	Review coverage chart re policies in litigation.	.90	517.50
Leveridge, R.	8/27/21	Review discovery responses and plan for follow up (0.4); communications with Liberty Mutual counsel re interrogatory responses (0.8); communications with counsel for Aon and co-counsel re subpoena issued to Aon (0.7).	1.90	2,660.00

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Name	Date	Services	Hours	Amount
Leveridge, R.	8/27/21	Confer with team re status of litigation and related matters.	.80	1,120.00
Ogrey, S.	8/27/21	Review Liberty and National Union responses to plaintiffs' first set of interrogatories.	.90	207.00
Sraders, S.	8/27/21	Confirm service of interrogatories on Liberty Mutual.	.10	57.50
Sraders, S.	8/27/21	Confer with team re developments in adversary and next steps.	.40	230.00
Colcock, S.	8/27/21	Confer with team re litigation status and strategy.	.40	132.00
Kaminsky, E.	8/27/21	Confer with team re adversary proceeding status and strategy.	.40	200.00
Rubinstein, J.	8/30/21	Review requested coverage charts (0.2); complete review of historic communications with insurers (2.3).	2.50	2,000.00
Ogrey, S.	8/30/21	Review verification of Gulf responses / answers to first set of interrogatories.	.10	23.00
Rubinstein, J.	8/31/21	Complete review of plaintiffs / insurer correspondence.	.50	400.00
Leveridge, R.	8/31/21	Review summary of communications from insurers re coverage.	1.10	1,540.00
Project Total:			186.40	\$ 161,033.50
TOTAL CHARGEABLE HOURS			1,112.10	
TOTAL FEES				\$ 944,616.50

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TIMEKEEPER SUMMARY

Timekeeper	Hours	Rate	Total
Gilbert, S.	119.90	1,700.00	203,830.00
Quinn, K.	45.20	1,100.00	49,720.00
Shore, R.	57.80	1,350.00	78,030.00
Litherland, C.	13.70	1,400.00	19,180.00
Holland, P.	4.60	290.00	1,334.00
Winstead, H.	6.80	950.00	6,460.00
Hudson, J.	134.50	725.00	97,512.50
Grim, E.	166.60	700.00	116,620.00
Rubinstein, J.	101.20	800.00	80,960.00
Wolf, D.	55.10	700.00	38,570.00
Sanchez, J.	7.80	375.00	2,925.00
Frazier, H.	88.10	675.00	59,467.50
Rush, M.	14.30	675.00	9,652.50
Martinez, S.	13.60	315.00	4,284.00
Johnson, K.	23.90	230.00	5,497.00
Bonesteel, A.	24.70	315.00	7,780.50
Gaske, A.	14.00	575.00	8,050.00
Lyle, R.	13.90	310.00	4,309.00
Leveridge, R.	58.90	1,400.00	82,460.00
Ogrey, S.	14.20	230.00	3,266.00
Sraders, S.	49.20	575.00	28,290.00
Colcock, S.	16.80	330.00	5,544.00
Kaminsky, E.	58.20	500.00	29,100.00
Lloyd, M.	9.10	195.00	1,774.50
TOTALS	1,112.10		\$ 944,616.50

TASK SUMMARY

Task	Description	Hours	Amount
A001	Asset Analysis & Recovery	32.50	26,026.00
A004	Case Administration	14.40	3,093.50
A006	Employment / Fee Applications	7.30	3,241.50
A009	Meetings / Communications with AHC & Creditors	24.70	30,927.50
A019	Plan of Reorganization / Disclosure Statement	846.80	720,294.50
A020	Insurance Adversary Proceeding	186.40	161,033.50

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EXPENSE DETAILS

E106: Online Research

Date	Description	Task	Amount
8/16/21	Lexis	E106	260.61
8/31/21	Westlaw	E106	2,069.32
8/31/21	PACER	E106	204.30
Sub-Total of Expenses:			\$ 2,534.23

E123: Contracted Service Fees

Date	Description	Task	Amount
6/30/21	Contracted Service Fees / Nathan Associates / J. Horewitz - Expert Witness / 2021.06.01 - 2021.06.30	E123	34,350.00
7/31/21	Contracted Service Fees / Nathan Associates / J. Horewitz - Expert Witness / 2021.07.01 - 2021.07.31	E123	10,681.25
Sub-Total of Expenses:			\$ 45,031.25

TOTAL EXPENSES **\$ 47,565.48**

TOTAL FEES AND EXPENSES **\$ 992,181.98**